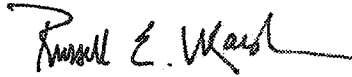


Timothy J. Mulreany
Chief Trial Attorney
March 20, 2019
Page 3

As mentioned above, Mr. Kerr reserves the right to assert all privileges, including attorney-client privilege and any privilege against self-incrimination, at any time; and further requests that you keep this production non-public to the greatest extent possible.

Please contact me if you have any questions about this production.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell E. Marsh", with a long horizontal flourish extending to the right.

Russell E. Marsh

REM/dkc

cc: P. Sterling Kerr
CFTC Investigator George H. Malas

**Exhibit 6 - Information & Documents Produced by David L.
Kagel**

LAW OFFICES OF P. STERLING KERR

June 15, 2018

Meta-Tech Consultants, LLC
c/o Justin Baraglia
5934 Manola Way
Los Angeles, CA 90068-3041

Re: Omicron Trust (Trading Program- BTC) [REDACTED], Consultant

Gentlemen:

We have acted as counsel to KINETIC MARKETING SYSTEMS, INC, a Wyoming Corporation ("Client"), in connection with that certain trading program known as Omicron Trust ("Omicron") traded through consultant, [REDACTED] ("Consultant"). In such capacity, we have reviewed certain documents, reports and computer programs and made general investigations with respect to the following:

1. Review of trading history client spreadsheets for several separate clients of Consultant;
2. Review of demo trading history report dated June 15, 2018 in four (4) hour time block commencing on or about 2:00am to 6:00am;
3. Review of trading program BTC/fiat currency trading pairs;
4. Engaged in 26 minute test trade of 0.2 BTC;
5. Review Omicron Trust web platform, test transaction, discussion with Consultant;

The information reviewed above was conducted in the presence of Consultant at Consultant's Hotel accommodation and separately at the undersigned's office address in Henderson, Nevada. Test trades were conducted utilizing both computer and other devices, including the undersigned's personal device and Coinbase account.

In rendering our opinion we have also examined independent research and consulted with other experts as we have deemed necessary for the purposes of the opinion herein expressed. We have assumed that consultant has been engaged in the crypto-currency industry for many years and we have independently verified Consultant's programming credentials.

We have not made any investigation of and do not express an opinion as to, any matters of the legality of the trading program, nor do we express any opinion as to the trading program's adherence to Federal or State securities laws in the solicitation of BTC to trade on the Omicron trading website.

2450 St. Rose Parkway • Suite 120 • Henderson, NV 89074
Phone: (702) 451-2055 • Fax: (702) 451-2077
www.sterlingkerlaw.com

LAW OFFICES OF P. STERLING KERR

This opinion letter is limited to the matters stated herein as of the date hereof and no opinion is implied or may be inferred beyond the matters expressly stated.

We give no opinion regarding any tax implications resulting from trading on the Omicron platform.

Based on the foregoing and upon such investigation as we have deemed necessary, and subject to the qualifications and exceptions herein contained, we are of the opinion that:

1. The Consultant has **historical trades** for clients with returns on the trading at a minimum of two (2) times the investment over varying periods of time.¹ The time periods for the return from the Consultant client spreadsheets vary from 24 hours to more than 40 days. The spreadsheets did not show each trade in the time period, but rather the BTC in the trade at the beginning of the trading period, random periodic returns and the final return to client at the conclusion of the trading period. The client spreadsheets also indicated the destination wallets upon conclusion of the trading period and amounts sent. In rendering the above opinion, we have assumed that the spreadsheets (because of the volume of information, among other things) were true and correct records of the trading of Consultant.

2. The **demo trading history report** dated June 15, 2018 in a four (4) hour time block commencing on or about 2:00am to 6:00am, showed significant return on initial investment. The Consultant's algorithm traded 16 exchange platforms (ie., Gemini, GDAX) with 16 sets of trading pairs, including fiat/BTC pairs, FOREX pairs and other crypto-currency pairs. The trading period for the June 15, 2018 demo occurred in a downward trending market. The report that the undersigned reviewed showed all of the trades for a specific limited time in the four (4) hour time block with a summary of trades (total trades exceeded 7,400 trades in the block). The demo started with fiat \$1,000 USD and concluded the four (4) hour block with \$54,900 USD. In rendering the above opinion, we have assumed that the demo trading history report was a true and correct record of the trading of Consultant.

3. The Consultant's trading algorithm (referred to by Consultant as "BOTS") generated two (2) times the investment in BTC over a 26 minute test period. The undersigned transferred 0.2 BTC from the undersigned's Coinbase account to Consultant. Consultant inserted the BTC into the trading algorithm and timed the trading for 26 minutes. At the conclusion of the 26 minute period the trading algorithm closed and 0.4 BTC were returned to the undersigned's Coinbase account by Consultant. In rendering the above opinion, we have assumed that the Consultant was only returning BTC to the undersigned generated by the trading algorithm during the 26 minute period.

In discussions with the Consultant the undersigned determined that the trading algorithm BOTS utilize artificial intelligence and trade based on RSS feeds of information concerning the markets, historical trends in the market (both short term and long term), and momentum in the market,

¹ Of the reviewed records, the return on investment for certain clients of Consultant was substantially higher than two (2) times the initial investment over the trading period.

LAW OFFICES OF P. STERLING KERR

among other information. Consultant did not provide to the undersigned sample source code, but did provide to the undersigned a description of the program and coding language utilized by Consultant to create the trading algorithm. The coding utilizes a hybrid C++ language in the LINUX environment.

In delivering the opinions set forth in paragraphs numbered 1 through 3, above, we have assumed the following:

(a) That all of the transactions set forth in the records reviewed by the undersigned are correct and completely detail the trading history as represented.

(b) That the Consultant has complied with his duty of good faith and fair dealing with respect to the transactions memorialized by the client history spreadsheets, demo trade reports and by the 26 minute trading algorithm test.

This opinion letter is subject to the following limitations:

(a) The undersigned cannot guaranty that the Consultant has not created an elaborate trading history and internet trading platform to intentionally deceive the undersigned.

(b) The undersigned is an attorney licensed in the State of Nevada only. The undersigned is not a professional currency or crypto-currency trader, nor is the undersigned a professional computer engineer. The undersigned may not possess the skill sufficient to determine whether the information provided by the Consultant is false or has been altered.

The foregoing opinions may be relied upon by Meta-Tech Consultants, LLC, its successors and/or assigns, but may not be relied upon by any other party.

Respectfully submitted,

Sterling Kerr

P. Sterling Kerr, for the Professional Corporation

2450 St. Rose Parkway ♦ Suite 120 ♦ Henderson, NV 89074

Phone: (702) 451-2055 ♦ Fax: (702) 451-2077

www.sterlingkerrlaw.com

**Exhibit 7 - David Saffron Coinbase Virtual Currency Account
Records**



548 Market Street #23008
 San Francisco, CA 94104
 Phone: 1-888-908-7930

Account Statement Period	01/01/2017 - 03/21/2019
---------------------------------	-------------------------

Account Summary

Account Name	Balance on 03/21/2019
BCH Wallet	0.0000 BCH
ETH Wallet	0.0000 ETH
LTC Wallet	0.0000 LTC
MY BITCOINS	0.0000 BTC
Mana1972	0.0000 BTC
USD Wallet	\$0.00 USD

Transaction History

No transactions during this period

Account Information

david Saffron

daidsaffron@live.com

██████████
 PALM DESERT CA, ██████████
 US

**Exhibit 8 – David Saffron Uphold Virtual Currency Account
Records**

Users

Search

Saffron888
david.saffron@live.com

User status: **Individual**

FLAG RESTRICT BLOCK

Saffron888
joined at Apr 20, 2018 - 07:56 PM

Profile
User ID: [REDACTED] b7d
Name: **David Saffron**
Email: **davidsaffron@live.com**
Address: [REDACTED]
los angeles
Country: **United States of America** State: **California**
Birth date: [REDACTED] **1972**
Terms of Service Acceptance: **Apr 20, 2018 - 07:56 PM**
OTP Settings
Enabled for login
Enabled when sending money to an Uphold member or an email
Enabled when sending money to a virtual currency address
Enabled when issuing and showing details of Virtual Mastercards
Transactions
Go to user transactions
Accounts
Go to user accounts
Cards
Go to user cards
Vouchers
Go to user vouchers

Verifications
Identity Required MORE
Screening
Status Result
Nonmatch Ok
Matches MORE
Phones C
Result Review Status
ok false ok
Notice: **+1 310-849-6408** Country: **US** Status: **Primary**
Business START PROCESS
Value: **None**
This is an individual user account.
Volume
Amount MORE
Count MORE
Last 24 Hours MORE

Identity ADD LOCK
Status: **Failed** Reason: **None**
Review required: **False** LESS
This user's identity status is failed due to: **"Not-Uploaded"**
Full identity trail
passport (status: error) LESS

Created at
Apr 20, 2018 - 06:54 PM

Address LESS

identity

identity
AU

createdAt
2018-04-21T03:54:16.128Z

documentType
Passport

documentId

documentId

documentId

documentId

documentId

provider
Netverify

documentId

documentId
E17e3180-7e18-4054-A210-3415b96c7bd0

documentId
Not-Uploaded

documentId

documentId
Error

passport (Status: error) LESS

Created at
Apr 20, 2018 - 08:45 PM

Address LESS

identity

identity
AU

createdAt
2018-04-21T03:45:43.959Z

documentType
Passport

documentId

09/20/19

09/20/19

09/20/19

09/20/19

09/20/19

Netverify

09/20/19

Hidden Part-Documents, Blurred, Not-
Readable-Documents

09/20/19

858e29bb-06d7-4d1c-8892-E765f26a4409

09/20/19

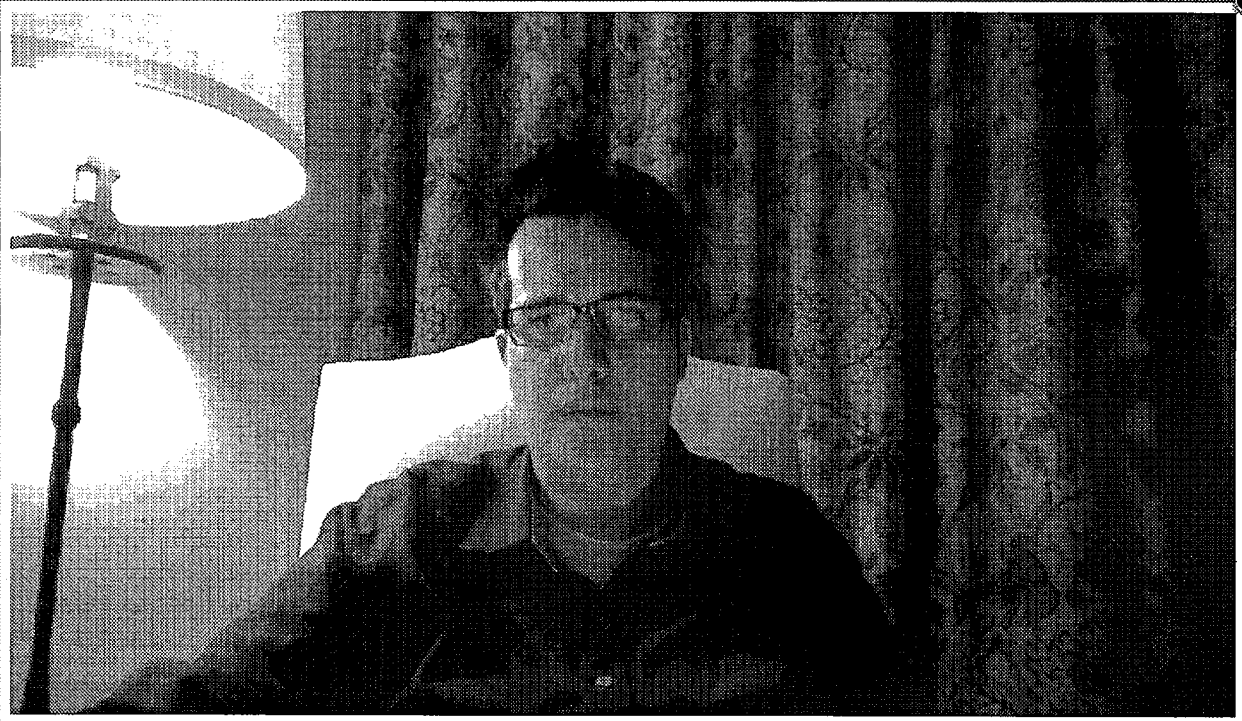
Unreadable

09/20/19

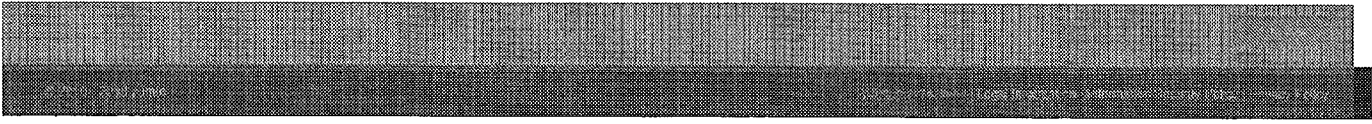
09/20/19

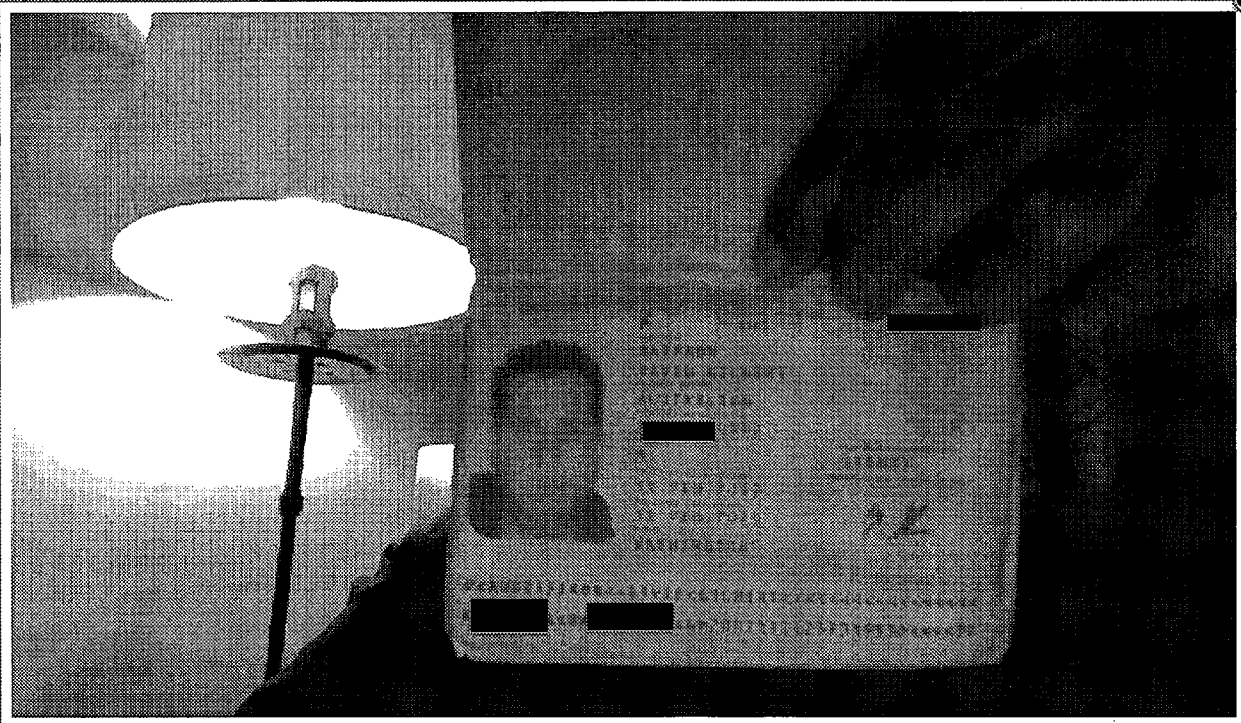
Error

09/20/19 09:20:19 AM 09/20/19 09:20:19 AM

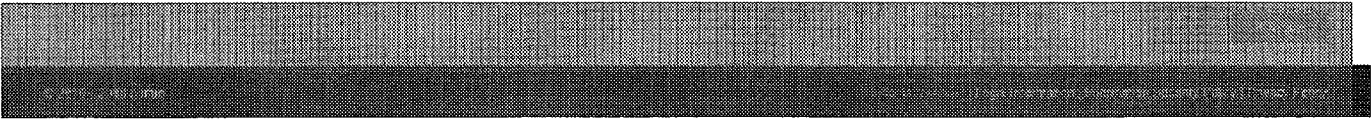


Face





Frontside





[Dashboard](#)
[Verifications](#)
[Create verification](#)
[Settings](#)
[Support](#)
[My profile](#)
[Log out](#)



Verification

Bitreserve - Production

Customer ID [REDACTED] sh74
 Additional information -
 Merchant reference uphold/e293872-3470-4c0f-8acb-61478aa309e0
 Merchant reporting criteria -
 Personal number -

Document data

Document type	Passport	Expiry	-
Document subtype	-	Issuing date	-
Number	-	State	-
Optional data 1	-	Issuing country	Australia
Optional data 2	-	Issuing authority	-
		Issuing place	-

Customer data

▼ Personal

First name -
 Last name -
 Date of birth -

▲ Address

Security checks

Similarity	N/A	Reason	N/A
Validity	N/A	Handwritten note	N/A
M/RZ code	N/A	Signature	N/A
Data positions	N/A	Microprint	N/A
Security features	N/A	Hologram	N/A
ID check document validation	N/A		

Transaction log

Status Done
 Verification status Error (not readable ID)
 Scan reference 858e29bb-06d7-4d1c-8682-e765f25a4409 Copy
 Source WEB-UPLOAD
 Transaction date 2018-04-21 03:45:14
 Client IP 24.120.53.37
 Reject reason Not readable document
 Reason details Part of the document is hidden, Blurred

Events

Timestamp	Category	Payload
2018/04/21 04:02:17.752	CALLBACK_SUCCESS	<pre>{ "httpStatus": "204", "callbackURL": "https://api.uphold.com/webhooks/netverify" }</pre>



Transactions

Search



9b74

Status	Description	Fee	Rate	Type	View on Blockchain
completed	0.01130995 BTC	0.00 BTC	1.00 BTC	Deposit	

David Seifon sent 0.01077159 BTC to

bDQ

Created: 4/20/2018 - 08:55 PM | Comment: 4/20/2018 - 08:17 PM

Bitcoin Network sent 0.01130995 BTC to David Seifon
Created: 4/20/2018 - 08:53 PM | Comment: 4/20/2018 - 08:38 PM

Transaction

Transaction ID

127e5725-8c53-4644-9bd4-872795db9c7



Origin

Transaction Details

Description

Bitcoin Network

Amount

0.01130995 BTC 0.01130995 BTC

Commission

0.00 BTC 0.00 BTC



Destination

Transaction Details

Description

David Seifon

Amount

0.01130995 BTC 0.00000012 BTC

Fee

0.01130995 BTC 0.00 BTC

Type

0.00 BTC



Transactions

Search



[Redacted] 9674

David Saffron sent 0.01077189 BTC to

[Redacted]

Created: 4/20/2018 - 6:53 PM | Completed: 4/20/2018 - 9:17 PM

Bitcoin Network sent 0.0130995 BTC to David Saffron
Created: 4/20/2018 - 6:03 PM | Completed: 4/20/2018 - 9:08 PM

Status	Description	Fee	Rate	Type
completed	0.01077189 BTC	0.00053794 BTC	1.00 BTC	Withdraw

[View on Blockchain](#)

Transaction

Transaction ID:

513c0420-3061-4c99-a005-34a91ca2d300



Origin

Transaction Details

Description:

David Saffron

Amount:

0.0130995 BTC

Fee:

0.01077189 BTC

Created:

0.000 BTC

Fee:

0.00053794 BTC



Destination

Transaction Details

Description:

1G29EC4RBTX7WV0BT4VR8H1F6JAY1009516A2mC4MTX7wvd8TPYR8pLFGLVMQ8DG

Amount:

0.01077189 BTC 0.01077189 BTC 0.01077189 BTC 0.000 BTC

Fee:

0.000 BTC



Cards

Search



b74



Dee Bank

Balance: \$ 0.00000012 BTC | Available: \$ 0.00000012 BTC



EUR card

Balance: € 0.00 EUR | Available: € 0.00 EUR



USD card

Balance: \$ 0.00 USD | Available: \$ 0.00 USD



XAU card

Balance: XAU 0.00 oz | Available: XAU 0.00 oz

Card Label	Currency	Balance	Available
Dee Bank	BTC	\$ 0.00000012 BTC	\$ 0.00000012 BTC



Card ID

b7c

Crypto Addresses

Bitcoin Address

b7c

Dash Address

TLu

Ethereum Address

b7c

Litecoin Address

b7c

Bitcoin Cash Address

b7c

Bitcoin Gold Address

b7c

Viacoin Address

NA

Transactions

Go to transactions



Cards

Search



b74

Card Label

Currency

Balance

Available

EUR card

EUR

€ 0.00 EUR

€ 0.00 EUR



Dee Bank

Balance: 0.00000012 BTC | Available: 0.00000012 BTC



EUR card

Balance: € 0.00 EUR | Available: € 0.00 EUR



USD card

Balance: \$ 0.00 USD | Available: \$ 0.00 USD



XAU card

Balance: XAU 0.00 oz | Available: XAU 0.00 oz



Card ID

b7d

Crypto Addresses

Bitcoin Address

N/A

Dash Address

N/A

Ethereum Address

N/A

Litecoin Address

N/A

Bitcoin Cash Address

N/A

Bitcoin Gold Address

N/A

Monero Address

N/A

Transactions

[Go to transactions](#)



Cards

Search



b74

Card type	Currency	Balance	Available
USD card	USD	\$ 0.00 USD	\$ 0.00 USD



Dee Bank

Balance: \$ 0.00 USD | Available: \$ 0.00 USD



EUR card

Balance: \$ 0.00 EUR | Available: \$ 0.00 EUR



USD card

Balance: \$ 0.00 USD | Available: \$ 0.00 USD



XAU card

Balance: XAU 0.00 oz | Available: XAU 0.00 oz



Card ID

b74

Crypto Addresses

Bitcoin Address

N/A

Ethereum Address

N/A

Bitcoin Cash Address

N/A

Bitcoin Gold Address

N/A

Bitcoin Dash Address

N/A

Bitcoin Gold Address

N/A

Vostro Address

N/A

Transactions

Go to transactions



Cards

Search



b74

Card Label	Currency	Balance	Available
XAU card	XAU	XAU 0.00 oz	XAU 0.00 oz



Dee Bank

Balance: \$ 0.00000012 BTC | Available: \$ 0.00000012 BTC



EUR card

Balance: € 0.00 EUR | Available: € 0.00 EUR



USD card

Balance: \$ 0.00 USD | Available: \$ 0.00 USD



XAU card

Balance: XAU 0.00 oz | Available: XAU 0.00 oz



Card ID

b74

Crypto Addresses

Bitcoin Address

N/A

Dash Address

N/A

Ethereum Address

N/A

Litecoin Address

N/A

Bitcoin Cash Address

N/A

Bitcoin Gold Address

N/A

Monero Address

N/A

Transactions

[Go to transactions](#)

**Exhibit 9 – David Saffron Gemini Virtual Currency Account
Records**

[illegible]

DAVIDSAFFRON@MAIL.COM'S ACCOUNT

Account Summary
Go to User 200204 Page 2
Add View
Account History (list)
Account Setup History (list)
Blockscore Watchlist
Candidates
Freescore Watchlist Records
Bank Accounts
Admin Credit/Debit
ACH Deposit Limits
ACH Management
FX Management
Withdrawal Watchlist
Withdrawal Fee Overrides
Update Account Settings
Name / Company ID
Account Address
Exchange Controls
IP Restrictions
Account Invoices
Linked Accounts
Crypto Withdrawal Ban

Search Cash Mgmt Compliance Watcher General Settings Sign out

DAVIDSAFFRON@MAIL.COM'S ACCOUNT'S BANK SETUP

New Bank Account

Account number	
Name on account	
Bank name*	

* Display name will be displayed to the user. Leave this blank to auto-generate based on the routing number and account type.

☐ Checking
 ☐ Savings
 ☐ Prepaid
 ☐ Other

☐ None
 ☐ Corporate
 ☐ Personal

Create Bank Account

ACTIVE ACCOUNTS

Show: 50 entries

ID	Ref ID	Created	Name on Account	Display Name	ACH Routing number	Account number	Type	Verbiat	Primary?	Wire ABA/SWIFT	International?
55376	55355	3/15/18 20:22:07	SUNHL SCOT	Chase Checking-3009	11000156	0059	Personal Checking	Not verified, 0 entries	Yes	N/A	No

Showing 1 to 1 of 1 entries

Search:

Previous Next

DELETED ACCOUNTS

Show: 50 entries

ID	Ref ID	Created	Name on Account	Display Name	ACH Routing number	Account number	Type	Verbiat	Primary?	Wire ABA/SWIFT	International?
No data available in table											

Showing 0 to 0 of 0 entries

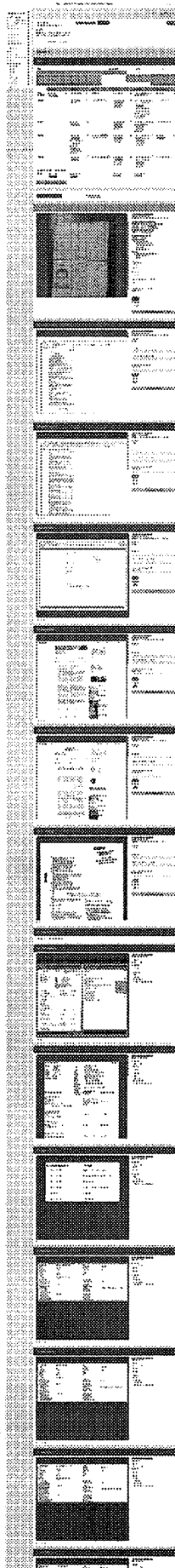
Search:

Previous Next

[illegible][illegible][illegible]

Item	Value
1. 1000	1000
2. 1000	1000
3. 1000	1000
4. 1000	1000
5. 1000	1000
6. 1000	1000
7. 1000	1000
8. 1000	1000
9. 1000	1000
10. 1000	1000
11. 1000	1000
12. 1000	1000
13. 1000	1000
14. 1000	1000
15. 1000	1000
16. 1000	1000
17. 1000	1000
18. 1000	1000
19. 1000	1000
20. 1000	1000
21. 1000	1000
22. 1000	1000
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28. 1000	1000
29. 1000	1000
30. 1000	1000
31. 1000	1000
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39. 1000	1000
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63. 1000	1000
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82. 1000	1000
83. 1000	1000
84. 1000	1000
85. 1000	1000
86. 1000	1000
87. 1000	1000
88. 1000	1000
89. 1000	1000
90. 1000	1000
91. 1000	1000
92. 1000	1000
93. 1000	1000
94. 1000	1000
95. 1000	1000
96. 1000	1000
97. 1000	1000
98. 1000	1000
99. 1000	1000
100. 1000	1000

[illegible][illegible][illegible]



[illegible]

**Exhibit 10 – David Saffron KuCoin Virtual Currency Account
Records**

Message

From: Nina Lee [nina.li@kucoin.com]
Sent: 8/13/2019 5:26:54 AM
To: Malas, George [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=gmlas]
Subject: [EXTERNAL] Re: Re: Request for the Information of David Gilbert Saffron
Attachments: Attachment A-davidsaffron@live.com.xlsx

Dear Sirs,

1. We write on behalf of KuCoin in response to your letter of 1 August 2019 ("the Letter"), requesting the assistance of KuCoin in connection with the above captioned matter. We shall adopt the same abbreviations where appropriate.

2. At the outset, we would like to clarify that KuCoin has no U.S. presence and is not subject to the jurisdiction of United States Commodity Futures Trading Commission, which issued the Letter, nor of any other federal court, agency or department.

3. Nevertheless, KuCoin is pleased to cooperate **voluntarily** with your office to provide information responsive to the Letter, **while expressly reserving and not waiving any jurisdictional, service or other defences or objections.**

4. We would like to highlight the following:-

(a) On 1 August 2019 , We have provided an excel form named Attachment A-
davidsaffron@live.com;

(b) The said excel form has clearly addressed your concern and all spetic questions;

(c) Please read the said excel form carefully.

5. With regards to your first question, Mr.Saffron's account was ever funded with any type of deposit. For more specific information, please refer to the sub-tables of this form, named Deposit& Withdraw.

email	coin_type	type	address	amount	created_at
davidsaffron@live.com	DGB	DEPOSIT	[REDACTED]	200000	2018-04-26 10:15:02.0
davidsaffron@live.com	PAY	DEPOSIT	[REDACTED]	7000	2018-04-26 10:09:01.0
davidsaffron@live.com	ETC	WITHDRAW	[REDACTED]	0.98495587	2018-05-23 08:16:48.0
davidsaffron@live.com	ETC	DEPOSIT	[REDACTED]	1	2018-04-26 09:39:54.0
davidsaffron@live.com	ETC	WITHDRAW	[REDACTED]	1.099	2018-04-26 15:56:34.0
davidsaffron@live.com	ETC	WITHDRAW	[REDACTED]	0.826	2018-05-01 10:29:57.0

6. With regards to your second question, please refer to the sub-tables of this form, named transaction.

7. With regards to your third question, all information related to the account is well covered by the said form.

We hope the above clarifies.

KuCoin

'Malas, George' via rbenquiries <rbenquiries@kucoin.com> 于2019年8月1日周四 下午9:27写道 :

Hello,

Thank you very much for your response. I have a few follow-up questions:

1. Can you tell me if Mr. Saffron's account was ever funded with any type of deposit?
2. Were there any transactions entered or executed in the account from the time the account was opened through today?
3. Are there any account opening or other documents related to the account that you can provide?

Thank you again for time and cooperation.

Best regards,
George

On: 01 August 2019 02:33, "rbenquiries@kucoin.com" <rbenquiries@kucoin.com> wrote:

Dear

Sirs,

RESPONSE TO REQUEST FOR INFORMATION RELATING TO CERTAIN CLIENTS OF DAVID
SAFFRON AND CIRCLE SOCIETY CORP.

1. We write on behalf of KuCoin in response to your letter of 26 June 2019 (the "1st Letter") and your letter dated 26 July 2019 (the "2nd Letter"), requesting the assistance of KuCoin in connection with the above captioned matter. We shall adopt the same abbreviations where appropriate.

2. At the outset, we would like to clarify that KuCoin has no U.S. presence and is not subject to the jurisdiction of United States Commodity Futures Trading Commission, which issued the Letter, nor of any other federal court, agency or department.

3. Nevertheless, KuCoin is pleased to cooperate voluntarily with your office to provide information responsive to the Letter, while expressly reserving and not waiving any jurisdictional, service or other defences or objections.

4. In our 1st response letter to you dated 10 July 2019 which stated that we have failed to find the relevant information as per your request. However, upon the receipt of your 2nd Letter we have appointed another senior officer to conduct a specific research with the following vital identification tags in relation to one David

Saffron:

'first_name': 'david'

'last_name': 'saffron'

'birthday': '1972-09-24'

'contact_city': 'los angles'

'contact_province': 'california'

in our database, as a result, we have found that one digital asset account with its registration email address dauidsaffron@live.com may possibly match your request in relation to one **David Saffron** (hereinafter referred to as the **"Alleged Account"**).

5. We would like to provide the following information to help your office to have a better understanding of the status of the Alleged Account:

(a) The Alleged Account was opened on 26 April 2018, however, the owner of the Alleged Account has refused, neglected or otherwise failed to complete the KYC procedure in light with the AML & KYC policies of KuCoin;

(b) For the above-mentioned reasons, KuCoin must set a withdrawal limitation for the Alleged Account in light with our existing AML & KYC policies, more specifically, the owner of the Alleged Account is unable to withdrawal any digital asset which the substantial value exceeds two (2) Bitcoin in each calendar day;

(c) From December 2018, KuCoin has refused to accept any and/or all new registration application filed by the United States customers;

(d) For more specific information arising out of and/or in connection with the Alleged Account, please kindly refer to Attachment A in our email.

6. We are regret to tell you that we have failed to find any record or any users or any accounts in the name of, or associated with one Circle Society Corp.

7. We hope that any further enquirers from CFTC can be directly sent to the email address rbenquiries@kucoin.com, otherwise KuCoin is unable to response your office in a timely manner.

8. We trust the above-mentioned clarification is useful to you.

9. Please do not hesitate to contact us if you have any questions or wish to discuss this matter.

Regards,
KuCoin

<rbenquiries@kucoin.com> 于2019年8月1日周四 下午2:30写道:

Dear

Sirs,

RESPONSE TO REQUEST FOR INFORMATION RELATING TO CETAIN CLIENTS OF DAVID SAFFRON AND CIRCLE SOCIETY CORP.

1. We write on behalf of KuCoin in response to your letter of 26 June 2019 (the "1st Letter") and your letter dated 26 July 2019 (the "2nd Letter"), requesting the assistance of KuCoin in connection with the above captioned matter. We shall adopt the same abbreviations where appropriate.

2. At the outset, we would like to clarify that KuCoin has no U.S. presence and is not subject to the jurisdiction of United States Commodity Futures Trading Commission, which issued the Letter, nor of any other federal court, agency or department.

3. Nevertheless, KuCoin is pleased to cooperate voluntarily with your office to provide information responsive to the Letter, while expressly reserving and not waiving any jurisdictional, service or other

defences

or

objections.

4. In our 1st response letter to you dated 10 July 2019 which stated that we have failed to find the relevant information as per your request. However, upon the receipt of your 2nd Letter we have appointed another senior officer to conduct a specific research with the following vital identification tags in relation to one David Saffron:

'first_name':

'david'

'last_name': 'saffron'

'birthday':

'1972-09-24'

'contact_city':

'los

angles'

'contact_province':

'california'

in our database, as a result, we have found that one digital asset account with its registration email address dauidsaffron@live.com may possibly match your request in relation to one **David Saffron** (hereinafter referred to as the "Alleged Account").

5. We would like to provide the following information to help your office to have a better understanding of the status of the Alleged Account:

(a) The Alleged Account was opened on 26 April 2018, however, the owner of the Alleged Account has refused, neglected or otherwise failed to complete the KYC procedure in light with the AML & KYC policies of KuCoin;

(b) For the above-mentioned reasons, KuCoin must set a withdrawal limitation for the Alleged Account in light with our existing AML & KYC policies, more specifically, the owner of the Alleged Account is unable to withdrawal any digital asset which the substantial value exceeds two (2) Bitcoin in each calendar day;

(c) From December 2018, KuCoin has refused to accept any and/or all new registration application filed by the United States customers;

(d) For more specific information arising out of and/or in connection with the Alleged Account, please kindly refer to Attachment A in our email.

6. We are regret to tell you that we have failed to find any record or any users or any accounts in the name of, or associated with one Circle Society Corp.

7. We hope that any further enquirers from CFTC can be directly sent to the email address rbenquiries@kuocoin.com, otherwise KuCoin is unable to response your office in a timely manner.

8. We trust the above-mentioned clarification is useful to you.

9. Please do not hesitate to contact us if you have any questions or wish to discuss this matter.

Regards,
KuCoin

'Malas, George' via rbenquiries <rbenquiries@kucoin.com> 于2019年7月26日周五 上午4:05写道 :

Hello,

Thank you for your response (included below) to my inquiry made on June 26, 2019. I have a follow-up request that I'm hoping you can assist with. In your response below, it states that a search was done on the "users" in your database based on the information that I previously provided.

To clarify and make sure that I understand your response, can you please confirm that KuCoin has no record of any users OR any accounts in the name of, OR associated with, the following individual and/or entity:

1. David Gilbert Saffron or David Saffron a/k/a David Gilbert / SS#: xxx-xx-0877 / DOB: xx/xx/1972 / last known address: [REDACTED] Las Vegas, Nevada [REDACTED]; many previous addresses in Los Angeles, California.
2. Circle Society Corp. / 2450 St. Rose Parkway, Suite 120, Henderson, Nevada 89074

Thank you again for your prompt attention to this matter and please contact me should you have any questions or require further information.

Best regards,

George

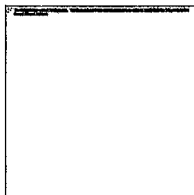
George H. Malas, CAMS, CFE

Futures Trading Investigator

Commodity Futures Trading Commission, Division of Enforcement

1155 21st Street, NW | Washington, DC 20581 | Tel: 202.418.5249 | Fax: 202.818.3129

gmalas@cftc.gov | www.cftc.gov



From: rbenquiries@kucoin.com [mailto:rbenquiries@kucoin.com]
Sent: Wednesday, July 10, 2019 5:17 AM
To: Malas, George
Subject: [EXTERNAL] Re: Request for the Information of David Gilbert Saffron

Dear Sirs,

Your email has been well received by KuCoin. We write on behalf of KuCoin in response to your letter of 26 June and 8 July 2019, requesting the assistance of KuCoin in connection with production of David G. Saffron/David Kagel.

At the outset, we would like to clarify that KuCoin has no U.S. presence and is not subject to the jurisdiction of United States Commodity Futures Trading Commission, which issued the Letter, nor of any other federal court, agency or department.

Upon received your email, we conducted search on the database of our users based on the information you disclosed below:

a. David Gilbert Saffron or David Saffron a/k/a David Gilbert / SS#: xxx-xx-0877 / DOB: xx/xx/1972 / last known address: [REDACTED], Las Vegas, Nevada [REDACTED]; many previous addresses in Los Angeles, California;

b. Circle Society Corp. / 2450 St. Rose Parkway, Suite 120, Henderson, Nevada 89074

However, we have not found any users matching the above information.

We hope that any further enquirers from CFTC can be directly sent to the email address rbenquiries@kuocoin.com, otherwise KuCoin is unable to response your office in a timely manner.

Thanks for your patience.

Regards,

KuCoin

Message

From: Nina Lee [nina.li@kucoin.com]
Sent: 8/18/2019 10:23:09 PM
To: Malas, George [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=gmalas]
Subject: [EXTERNAL] Re: Re: Re: Request for the Information of David Gilbert Saffron

Dear George,

It is possible that even though Mr. Saffron never deposited any ETN into his account but his balance is sitting in ETN and not BTC. That's because, Mr. Saffron can trade his other virtual currencies he deposited in the account and converted them into ENT.

Best regards,

Nina

'Malas, George' via rbenquiries <rbenquiries@kucoin.com> 于2019年8月16日周五 上午6:14写道 :

Hello Nina,

I have one more follow-up question please. Mr. Saffron's account shows a current balance of 0.0065 Electroneum ("ETN"); however, Mr. Saffron's deposits into his account consisted of DigiByte ("DGB"), TenX ("PAY"), and BTC.

Is it possible that even though Mr. Saffron never deposited any ETN into his account that his balance is sitting in ETN and not BTC? I'm assuming this is possible in that Mr. Saffron could have traded his other virtual currencies he held in the account and converted them into ETN?

I would appreciate it if you could please confirm my understanding noted above. Thank you again in advance for your prompt attention to this matter.

Best regards,

George

From: Nina Lee [mailto:nina.li@kucoin.com]
Sent: Tuesday, August 13, 2019 5:27 AM
To: Malas, George
Subject: [EXTERNAL] Re: Re: Re: Request for the Information of David Gilbert Saffron

email	id	created_at	last_login_at
dauidsaffron@live.com	5ae12820c7c1881ca8c752d5	4/26/2018 9:15	12/3/2018 7:42

email	coin_type	coin_type_pair	amount_coin	direction	created_at
davidsaffron@live.com	PAY	BTC	830.6822	SELL	2018-04-26 10:30:17.0
davidsaffron@live.com	PAY	BTC	1410.875	SELL	2018-04-26 10:30:24.0
davidsaffron@live.com	PAY	BTC	72.491	SELL	2018-04-26 10:30:24.0
davidsaffron@live.com	PAY	BTC	885.566	SELL	2018-04-26 10:30:24.0
davidsaffron@live.com	PAY	BTC	1284.2932	SELL	2018-04-26 11:31:26.0
<u>davidsaffron@live.com</u>	PAY	BTC	33.5622	SELL	2018-04-26 11:31:29.0
davidsaffron@live.com	PAY	BTC	258.071	SELL	2018-04-26 11:31:30.0
davidsaffron@live.com	PAY	BTC	72.749	SELL	2018-04-26 11:31:31.0
davidsaffron@live.com	PAY	BTC	59.32	SELL	2018-04-26 11:31:31.0
davidsaffron@live.com	PAY	BTC	2027.877	SELL	2018-04-26 11:31:36.0
davidsaffron@live.com	PAY	BTC	45.137	SELL	2018-04-26 11:31:40.0
davidsaffron@live.com	PAY	BTC	19.376	SELL	2018-04-26 11:31:51.0
davidsaffron@live.com	PAY	BTC	0.0004	SELL	2018-04-26 11:49:06.0
davidsaffron@live.com	DGB	BTC	317.4429	SELL	2018-04-26 15:59:34.0
davidsaffron@live.com	DGB	BTC	2651.0384	SELL	2018-04-26 16:57:33.0
davidsaffron@live.com	DGB	BTC	1384.447	SELL	2018-04-26 16:57:34.0
davidsaffron@live.com	DGB	BTC	5145.09	SELL	2018-04-26 16:57:43.0
davidsaffron@live.com	DGB	BTC	12689.6262	SELL	2018-04-26 16:57:44.0
davidsaffron@live.com	DGB	BTC	5118.244	SELL	2018-04-26 16:58:20.0
davidsaffron@live.com	DGB	BTC	14563.1068	SELL	2018-04-26 16:58:22.0
davidsaffron@live.com	DGB	BTC	14545.4545	SELL	2018-04-26 16:58:30.0
davidsaffron@live.com	DGB	BTC	1257.027	SELL	2018-04-26 16:58:43.0
davidsaffron@live.com	DGB	BTC	1678.332	SELL	2018-04-26 16:59:53.0
davidsaffron@live.com	DGB	BTC	1509.1945	SELL	2018-04-26 16:59:54.0
davidsaffron@live.com	DGB	BTC	1384.447	SELL	2018-04-26 16:59:56.0
davidsaffron@live.com	DGB	BTC	5964.9975	SELL	2018-04-26 17:00:23.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:00:32.0
davidsaffron@live.com	DGB	BTC	6542.398	SELL	2018-04-26 17:00:36.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:00:41.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:00:48.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:00:56.0
davidsaffron@live.com	DGB	BTC	1255.769	SELL	2018-04-26 17:01:03.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:05.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:17.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:28.0
davidsaffron@live.com	DGB	BTC	518.0365	SELL	2018-04-26 17:01:35.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:35.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:42.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:01:56.0
davidsaffron@live.com	DGB	BTC	148.5155	SELL	2018-04-26 17:02:04.0
davidsaffron@live.com	DGB	BTC	1295.0714	SELL	2018-04-26 17:04:43.0
davidsaffron@live.com	DGB	BTC	12376.2376	SELL	2018-04-26 17:06:11.0
davidsaffron@live.com	DGB	BTC	12376.2376	SELL	2018-04-26 17:06:16.0

davidsaffron@live.com	DGB	BTC	12376.2376	SELL	2018-04-26 17:06:22.0
davidsaffron@live.com	DGB	BTC	2288	SELL	2018-04-26 17:07:25.0
davidsaffron@live.com	DGB	BTC	2559	SELL	2018-04-26 17:07:32.0
davidsaffron@live.com	DGB	BTC	4535	SELL	2018-04-26 17:07:32.0
davidsaffron@live.com	DGB	BTC	3821.866	SELL	2018-04-26 17:08:23.0
davidsaffron@live.com	DGB	BTC	1999	SELL	2018-04-26 17:08:36.0
davidsaffron@live.com	DGB	BTC	2000	SELL	2018-04-26 17:08:42.0
davidsaffron@live.com	DGB	BTC	4601.6351	SELL	2018-04-26 17:08:50.0
davidsaffron@live.com	DGB	BTC	928.4133	SELL	2018-04-26 17:08:51.0
davidsaffron@live.com	DGB	BTC	7550.487	SELL	2018-04-26 17:08:59.0
davidsaffron@live.com	DGB	BTC	7222.205	SELL	2018-04-26 17:09:10.0
davidsaffron@live.com	DGB	BTC	6061.8472	SELL	2018-04-26 17:09:54.0
davidsaffron@live.com	DGB	BTC	746.2686	SELL	2018-04-26 17:10:10.0
davidsaffron@live.com	DGB	BTC	1933.2871	SELL	2018-04-26 17:11:56.0
davidsaffron@live.com	DGB	BTC	12349.948	SELL	2018-04-26 17:12:57.0
davidsaffron@live.com	DGB	BTC	12349.948	SELL	2018-04-26 17:12:58.0
davidsaffron@live.com	DGB	BTC	1838.23	SELL	2018-04-26 17:13:14.0
davidsaffron@live.com	DGB	BTC	10632.7587	SELL	2018-04-26 17:13:37.0
davidsaffron@live.com	ETN	BTC	72470.63	BUY	2018-04-26 10:10:36.0
davidsaffron@live.com	ETN	BTC	715	BUY	2018-04-26 10:24:54.0
davidsaffron@live.com	ETN	BTC	220.36	BUY	2018-04-26 10:25:31.0
davidsaffron@live.com	ETN	BTC	14263.67	BUY	2018-04-26 10:26:02.0
davidsaffron@live.com	ETN	BTC	4149.02	BUY	2018-04-26 10:34:37.0
davidsaffron@live.com	ETN	BTC	702.12	BUY	2018-04-26 10:34:58.0
davidsaffron@live.com	ETN	BTC	2000	BUY	2018-04-26 10:35:22.0
davidsaffron@live.com	ETN	BTC	103279.58	BUY	2018-04-26 10:40:51.0
davidsaffron@live.com	ETN	BTC	15412.6	BUY	2018-04-26 10:41:12.0
davidsaffron@live.com	ETN	BTC	220.58	BUY	2018-04-26 10:45:26.0
davidsaffron@live.com	ETN	BTC	3437	BUY	2018-04-26 10:45:29.0
davidsaffron@live.com	ETN	BTC	3315	BUY	2018-04-26 10:45:34.0
davidsaffron@live.com	ETN	BTC	220.58	BUY	2018-04-26 10:45:35.0
davidsaffron@live.com	ETN	BTC	220.58	BUY	2018-04-26 10:45:57.0
davidsaffron@live.com	ETN	BTC	3751	BUY	2018-04-26 10:46:00.0
davidsaffron@live.com	ETN	BTC	220.58	BUY	2018-04-26 10:46:03.0
davidsaffron@live.com	ETN	BTC	3300	BUY	2018-04-26 10:46:03.0
davidsaffron@live.com	ETN	BTC	220.51	BUY	2018-04-26 10:53:55.0
davidsaffron@live.com	ETN	BTC	124704.96	BUY	2018-04-26 10:56:10.0
davidsaffron@live.com	ETN	BTC	12139.73	BUY	2018-04-26 10:59:47.0
davidsaffron@live.com	ETN	BTC	18567.74	SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	16390.93	SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	15095.19	SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	14970.96	SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	18450.19	SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	400	SELL	2018-05-23 08:15:01.0

davidsaffron@live.com	ETN	BTC	17631.52 SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	39.81 SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	9085.13 SELL	2018-05-23 08:15:01.0
davidsaffron@live.com	ETN	BTC	253967.06 SELL	2018-05-23 08:15:01.0

email	coin_type	type	address	amount
daidsaffron@live.com	DGB	DEPOSIT	DJCwzhpqYq5mPyABQHJeidsXWEc68mk8RQ	200000
daidsaffron@live.com	PAY	DEPOSIT	0xb4d3d6fc238f4a86f5c1f469a60e592b811f4673	7000
daidsaffron@live.com	BTC	WITHDRAW	15A2mC4MfTX7wvdeTRvR8trLFGiJvtQbDG	0.98495687
daidsaffron@live.com	BTC	DEPOSIT	1DBtrLp6E4SVERPcJoe3wEJkMJDoFW1GWu	1
daidsaffron@live.com	BTC	WITHDRAW	15A2mC4MfTX7wvdeTRvR8trLFGiJvtQbDG	1.099
daidsaffron@live.com	BTC	WITHDRAW	15A2mC4MfTX7wvdeTRvR8trLFGiJvtQbDG	0.826

created_at

2018-04-26 10:15:02.0

2018-04-26 10:09:01.0

2018-05-23 08:16:48.0

2018-04-26 09:35:54.0

2018-04-26 15:56:34.0

2018-05-01 10:29:57.0

email	event	ip
daidsaffron@live.com	LOGIN	172.250.74.82
daidsaffron@live.com	LOGIN	23.241.241.80
daidsaffron@live.com	LOGIN	24.120.53.37
daidsaffron@live.com	LOGIN	24.120.53.37, 172.24.0.66
daidsaffron@live.com	LOGIN	23.241.241.80
daidsaffron@live.com	LOGIN	172.250.59.10, 162.158.59.252, 172.24.253.10
daidsaffron@live.com	LOGIN	72.11.232.253
daidsaffron@live.com	WITHDRAW	72.11.232.253, 172.24.10.229
daidsaffron@live.com	LOGIN	72.11.232.253
daidsaffron@live.com	REGISTER	72.11.232.253
daidsaffron@live.com	LOGIN	72.11.232.253
daidsaffron@live.com	LOGIN	172.250.59.10, 172.24.10.126
daidsaffron@live.com	LOGIN	23.241.241.80, 172.24.0.69
daidsaffron@live.com	WITHDRAW	24.120.53.37, 172.24.0.87
daidsaffron@live.com	LOGIN	24.120.53.37
daidsaffron@live.com	LOGIN	12.130.125.214
daidsaffron@live.com	LOGIN	172.124.80.12
daidsaffron@live.com	WITHDRAW	172.124.80.12, 172.24.10.229
daidsaffron@live.com	LOGIN	172.250.59.10
daidsaffron@live.com	LOGIN	172.250.59.10

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{"system":"Windows 10","browser":"Chrome"}	2018-05-23 08:10:24.0
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NULL	2018-05-01 10:29:57.0
{"system":"Windows 10","browser":"Chrome"}	2018-12-03 07:41:04.0
{"system":"Windows 10","browser":"Chrome"}	2018-12-03 07:42:41.0

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		ter_user_	ter_user_	ter_user_	ods_ucen	ter_user_
		kyc_daily.	kyc_daily.	kyc_daily.	ter_user_	kyc_daily.
ods_ucenter_user_kyc_daily.	ods_ucenter_user_kyc_daily.	commit_s	verify_sta	verify_res	kyc_daily.	verify_us
id	user_id	tatus	tus	ult	operator	er
5c6a972d99a1d859f85f2191	5ae12820c7c1881ca8c752d5	2	0	NULL		NULL

ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen
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kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	ods_ucen
commit_a_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	verify_fail_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	first_name_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	ods_ucen
t_apply_at_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	_reason_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	e_kyc_daily.ter_user_ods_ucen	ods_ucen	ods_ucen	ods_ucen
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ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen
ods_ucen	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_
ter_user_	kyc_daily.	kyc_daily.	ods_ucenter_us	kyc_daily.	kyc_daily.	kyc_daily.	kyc_daily.	employem	ter_user_
kyc_daily.	id_numbe	id_expire	er_kyc_daily.tel	telephone	front_pho	back_pho	handle_p	ent_statu	kyc_daily.
id_type	r	_date	ephone	_verify	to	to	hoto	s	trades
			+1-3109093272	checked					NULL

							ods_ucen	ods_ucen	
	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ods_ucen	ter_user_	ods_ucen	ter_user_
ods_ucen	ods_ucen	ter_user_	ter_user_	ter_user_	ter_user_	ter_user_	kyc_daily.	ter_user_	kyc_daily.
ter_user_	ter_user_	kyc_daily.	kyc_daily.	kyc_daily.	kyc_daily.	kyc_daily.	company	kyc_daily.	capital_so
kyc_daily.	kyc_daily.	company	company	company	company	company	_postcod	capital_so	urce_com
position	company	_country	_province	_city	_street	_home	e	urce	ment
NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL

ods_ucen									
ods_ucen	ter_user_		ods_ucen	ods_ucen	ods_ucen	ods_ucen			
ter_user_	kyc_daily.	ods_ucen	ter_user_	ter_user_	ter_user_	ter_user_	ods_ucen		
kyc_daily.	investme	ter_user_	kyc_daily.	kyc_daily.	kyc_daily.	kyc_daily.	ter_user_		
year_inco	nt_amou	kyc_daily.	contact_c	contact_p	contact_ci	contact_p	kyc_daily.	ods_ucenter_user_kyc	
me	nt	status	ountry	rovince	ty	ostcode	old	_daily.created_at	
NULL	NULL	0	US	california	los angles	90019	true	2019-02-18 19:29:50.0	

	ods_ucen	ods_ucen	
	ods_ucente	ter_user_	ter_user_
ods_ucenter_user_kyc	r_user_kyc	kyc_daily.	kyc_daily.
_daily.updated_at	_daily.dt	dbname	tname
2019-02-18 19:29:50.0	2019-07-30	UCENTER	user_kyc

currency balance
ETN 0.0065

**Exhibit 11 – Preston Sterling Kerr Virtual Currency Account
Records**



548 Market Street #23008
San Francisco, CA 94104
Phone: 1-888-908-7930

Account Information

Preston Kerr

psklaw@aol.com

Henderson NV, [REDACTED]
US

Account Statement Period	10/13/2017 - 03/21/2019
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Account Summary

Account Name	Balance on 03/21/2019
BAT Wallet	0.0000 BAT
BCH Wallet	0.0000 BCH
BSV Wallet	0.0000 BSV
BTC Vault	0.0000 BTC
BTC Wallet	18.04706587 BTC
Cash (USD)	\$0.00 USD
ETC Wallet	0.0000 ETC
ETH Wallet	6.24808279 ETH
LTC Wallet	9.6402941 LTC
USDC Wallet	0.0000 USDC
XRP Wallet	0.0000 XRP
ZEC Wallet	0.0000 ZEC
ZRX Wallet	100.0000 ZRX

Transaction History

Date	Account	Transaction	Amount	Amount (USD)	Balance
03/08/2019	BTC Wallet	You received Bitcoin from an external account	5.0000 BTC	\$19,460.68 USD	18.04706587 BTC
02/28/2019	BTC Wallet	You received Bitcoin from an external account	0.1000 BTC	\$380.19 USD	13.04706587 BTC
02/27/2019	BTC Wallet	You received Bitcoin from an external account	5.0000 BTC	\$19,030.18 USD	12.94706587 BTC
02/20/2019	LTC Wallet	You purchased Litecoin	9.6402941 LTC	\$500.00 USD	9.6402941 LTC
02/15/2019	BTC Wallet	You received Bitcoin from an external account	0.48052155 BTC	\$1,712.96 USD	7.94706587 BTC
02/04/2019	Cash (USD)	You withdrew funds	-\$5,000.00 USD	\$5,000.00 USD	\$0.00 USD
02/04/2019	Cash (USD)	You purchased United States Dollar	\$5,000.00 USD		\$5,000.00 USD
02/04/2019	BTC Wallet	You sold Bitcoin	-1.49662757 BTC	\$5,000.00 USD	7.46654432 BTC
02/04/2019	BTC Wallet	You received Bitcoin from an external account	1.52625153 BTC	\$5,202.42 USD	8.96317189 BTC

Date	Account	Transaction	Amount	Amount (USD)	Balance
01/11/2019	BTC Wallet	You received Bitcoin from an external account	0.22637114 BTC	\$824.81 USD	7.43692036 BTC
01/10/2019	BTC Wallet	You received Bitcoin from an external account	0.36487218 BTC	\$1,324.49 USD	7.21054922 BTC
12/07/2018	BTC Wallet	You received Bitcoin from an external account	0.86785821 BTC	\$2,965.48 USD	6.84567704 BTC
11/15/2018	BTC Wallet	You received Bitcoin from an external account	0.13912393 BTC	\$771.72 USD	5.97781883 BTC
11/13/2018	BTC Wallet	You received Bitcoin from an external account	0.56123632 BTC	\$3,537.83 USD	5.8386949 BTC
11/09/2018	BTC Wallet	You received Bitcoin from an external account	0.63104488 BTC	\$3,995.44 USD	5.27745858 BTC
10/16/2018	ZRX Wallet	You purchased 0x	100.0000 ZRX	\$94.45 USD	100.0000 ZRX
10/16/2018	BTC Wallet	You received Bitcoin from an external account	0.769366 BTC	\$4,963.96 USD	4.6464137 BTC
10/04/2018	BTC Wallet	You received Bitcoin from an external account	1.52648684 BTC	\$9,994.55 USD	3.8770477 BTC
09/21/2018	BTC Wallet	You received Bitcoin from an external account	1.380957 BTC	\$9,295.22 USD	2.35056086 BTC
09/10/2018	BTC Wallet	You received Bitcoin from an external account	0.79968743 BTC	\$5,010.82 USD	0.96060386 BTC
09/10/2018	BTC Wallet	You received Bitcoin from an external account	0.15993348 BTC	\$1,002.16 USD	0.16993643 BTC
09/09/2018	BTC Wallet	You received Bitcoin from an external account	0.00018023 BTC	\$1.00 USD	0.01000295 BTC
09/09/2018	BTC Wallet	You sent Bitcoin to [REDACTED] 5Vgh	-7.68072317 BTC	-\$49,000.17 USD	0.00984272 BTC
09/07/2018	BTC Wallet	You received Bitcoin from an external account	6.86234755 BTC	\$43,987.65 USD	7.69056589 BTC
09/05/2018	BTC Wallet	You received Bitcoin from an external account	0.28954 BTC	\$1,999.04 USD	0.62821834 BTC
08/22/2018	BTC Wallet	You received Bitcoin from an external account	0.2000 BTC	\$1,330.00 USD	0.53867834 BTC
08/21/2018	BTC Wallet	You sent Bitcoin to [REDACTED] Kcy8	-3.00001911 BTC	-\$19,323.12 USD	0.33867834 BTC
08/21/2018	BTC Wallet	You received Bitcoin from an external account	0.2000 BTC	\$1,286.39 USD	3.33869745 BTC
08/18/2018	BTC Wallet	You received Bitcoin from an external account	1.2000 BTC	\$7,639.20 USD	3.13869745 BTC
08/17/2018	Cash (USD)	You sold United States Dollar	-\$2,000.00 USD		\$0.00 USD
08/17/2018	ETH Wallet	You purchased Ethereum	6.24808279 ETH	\$2,000.00 USD	6.24808279 ETH
08/17/2018	Cash (USD)	You sold United States Dollar	-\$12,000.00 USD		\$2,000.00 USD
08/17/2018	BTC Wallet	You purchased Bitcoin	1.79501181 BTC	\$12,000.00 USD	1.93869745 BTC
08/17/2018	BTC Wallet	You received Bitcoin from an external account	0.0160 BTC	\$103.79 USD	0.14368564 BTC

Date	Account	Transaction	Amount	Amount (USD)	Balance
08/16/2018	BTC Wallet	You received Bitcoin from an external account	0.0060 BTC	\$38.46 USD	0.12768564 BTC
08/15/2018	BTC Wallet	You received Bitcoin from an external account	0.0040 BTC	\$25.50 USD	0.12168564 BTC
08/11/2018	Cash (USD)	You withdrew funds	-\$10,000.00 USD	\$10,000.00 USD	\$14,000.00 USD
08/11/2018	Cash (USD)	You deposited funds	\$10,000.00 USD	\$10,000.00 USD	\$24,000.00 USD
08/11/2018	Cash (USD)	You sold United States Dollar	\$9,000.00 USD		\$14,000.00 USD
08/11/2018	BTC Wallet	You sold Bitcoin	-1.43389842 BTC	\$9,000.00 USD	0.11768564 BTC
08/01/2018	BTC Wallet	You sent Bitcoin to [REDACTED] 2DqJ	-0.01303531 BTC	-\$100.10 USD	1.55158406 BTC
07/11/2018	Cash (USD)	You deposited funds	\$5,000.00 USD	\$5,000.00 USD	\$5,000.00 USD
07/11/2018	BTC Wallet	You purchased Bitcoin	1.54532645 BTC	\$10,000.00 USD	1.56461937 BTC
07/11/2018	BTC Wallet	You sent Bitcoin to [REDACTED] pSu7	-0.40001411 BTC	-\$2,545.43 USD	0.01929292 BTC
07/11/2018	BTC Wallet	You sent Bitcoin to [REDACTED] kAn	-11.00001411 BTC	-\$70,025.54 USD	0.41930703 BTC
07/10/2018	BTC Wallet	You received Bitcoin from an external account	10.0000 BTC	\$63,951.60 USD	11.41932114 BTC
07/10/2018	BTC Wallet	You sent Bitcoin to [REDACTED] RHZp	-49.80001 BTC	-\$318,479.03 USD	1.41932114 BTC
07/10/2018	BTC Wallet	You sent Bitcoin to [REDACTED] RHZp	-0.20001411 BTC	-\$1,273.18 USD	51.21933114 BTC
07/09/2018	BTC Wallet	You received Bitcoin from an external account	50.0000 BTC	\$333,250.50 USD	51.41934525 BTC
07/05/2018	BTC Wallet	You received Bitcoin from an external account	0.2000 BTC	\$1,311.08 USD	1.41934525 BTC
07/05/2018	BTC Wallet	You sent Bitcoin to [REDACTED] z8ed	-0.10000976 BTC	-\$657.36 USD	1.21934525 BTC
06/15/2018	BTC Wallet	You sent Bitcoin to [REDACTED] EpJx	-1.00002099 BTC	-\$6,553.10 USD	1.31935501 BTC
06/15/2018	BTC Wallet	You received Bitcoin from an external account	0.4000 BTC	\$2,607.73 USD	2.319376 BTC
06/15/2018	BTC Wallet	You sent Bitcoin to [REDACTED] kR8S	-0.20002809 BTC	-\$1,310.19 USD	1.919376 BTC
05/18/2018	BTC Wallet	You purchased Bitcoin	0.11949554 BTC	\$1,000.00 USD	2.11940409 BTC
05/18/2018	BTC Wallet	You sent Bitcoin to [REDACTED] ppsD	-0.06782049 BTC	-\$556.23 USD	1.99990855 BTC
05/10/2018	BTC Wallet	You received Bitcoin from an external account	0.5497 BTC	\$4,993.79 USD	2.05772904 BTC
05/10/2018	BTC Wallet	You received Bitcoin from an external account	0.1101 BTC	\$897.67 USD	1.51802904 BTC
05/10/2018	BTC Wallet	You received Bitcoin from an external account	0.0005511 BTC	\$4.99 USD	1.40792904 BTC

Date	Account	Transaction	Amount	Amount (USD)	Balance
05/10/2018	BTC Wallet	You received Bitcoin from an external account	0.00010716 BTC	\$1.00 USD	1.40737794 BTC
05/09/2018	BTC Wallet	You received Bitcoin from an external account	0.12880318 BTC	\$1,200.00 USD	1.40727078 BTC
05/02/2018	BTC Wallet	You received Bitcoin from an external account	0.2800 BTC	\$2,578.80 USD	1.2784676 BTC
04/20/2018	BTC Wallet	You purchased Bitcoin	0.29907074 BTC	\$2,600.00 USD	0.9984676 BTC
04/07/2018	BTC Wallet	You purchased Bitcoin	0.69939686 BTC	\$5,000.00 USD	0.69939686 BTC

USER ATTRIBUTES ***

USER ID 59e146beb8770300ca6a78d8
 NAME Preston Kerr
 EMAIL psklaw@aol.com
 CREATED October, 13 2017 04:05pm PDT

TRANSACTIONS ***

TIMESTAMP	ACCOUNT NAME	TYPE	STATUS	BALANCE	AMOUNT
4/7/2018 10:21	BTC Wallet	Buy	Complete	0.69939686	0.69939686
4/20/2018 13:47	BTC Wallet	Buy	Complete	0.9984676	0.29907074
5/2/2018 16:32	BTC Wallet	Receive	Complete	1.2784676	0.28
5/9/2018 10:53	BTC Wallet	Receive	Complete	1.40727078	0.12880318
5/10/2018 10:16	BTC Wallet	Receive	Complete	1.40737794	0.00010716
5/10/2018 13:15	BTC Wallet	Receive	Complete	1.40792904	0.0005511
5/10/2018 13:17	BTC Wallet	Receive	Complete	1.51802904	0.1101
5/10/2018 15:20	BTC Wallet	Receive	Complete	2.06772904	0.5497
5/18/2018 19:59	BTC Wallet	Send	Complete	1.99990855	-0.06782049
5/18/2018 20:01	BTC Wallet	Buy	Complete	2.11940409	0.11949554
6/15/2018 10:11	BTC Wallet	Send	Complete	1.919376	-0.20002809
6/15/2018 10:41	BTC Wallet	Receive	Complete	2.319376	0.4
6/15/2018 11:43	BTC Wallet	Send	Complete	1.31935501	-1.00002099
7/5/2018 10:44	BTC Wallet	Send	Complete	1.21934525	-0.10000976
7/5/2018 11:12	BTC Wallet	Receive	Complete	1.41934525	0.2
7/9/2018 18:46	BTC Wallet	Receive	Complete	51.41934525	50
7/10/2018 10:43	BTC Wallet	Send	Complete	51.21933114	-0.20001411
7/10/2018 13:56	BTC Wallet	Send	Complete	1.41932114	-49.80001
7/10/2018 14:00	BTC Wallet	Receive	Complete	11.41932114	10
7/11/2018 9:01	BTC Wallet	Send	Complete	0.41930703	-11.00001411

7/11/2018 9:06 BTC Wallet	Send	Complete	0.01929292	-0.40001411
7/11/2018 9:34 BTC Wallet	Buy	Complete	1.56461937	1.54532645
7/11/2018 9:35 Cash (USD)	Deposit	Complete	5000	5000
8/1/2018 18:25 BTC Wallet	Send	Complete	1.55158406	-0.01303531
8/11/2018 12:45 BTC Wallet	Sell	Complete	0.11768564	-1.43389842
8/11/2018 12:45 Cash (USD)	Sell	Complete	14000	9000
8/11/2018 12:57 Cash (USD)	Deposit	Complete	24000	10000
8/11/2018 12:58 Cash (USD)	Withdrawal	Complete	14000	-10000
8/15/2018 13:00 BTC Wallet	Receive	Complete	0.12168564	0.004
8/16/2018 11:16 BTC Wallet	Receive	Complete	0.12768564	0.006
8/17/2018 8:38 BTC Wallet	Receive	Complete	0.14368564	0.016
8/17/2018 16:37 BTC Wallet	Buy	Complete	1.93869745	1.79501181
8/17/2018 16:37 Cash (USD)	Sell	Complete	2000	-12000
8/17/2018 16:39 ETH Wallet	Buy	Complete	6.24808279	6.24808279
8/17/2018 16:39 Cash (USD)	Sell	Complete	0	-2000
8/18/2018 14:18 BTC Wallet	Receive	Complete	3.13869745	1.2
8/21/2018 10:10 BTC Wallet	Receive	Complete	3.33869745	0.2
8/21/2018 12:20 BTC Wallet	Send	Complete	0.33867834	-3.00001911
8/22/2018 8:42 BTC Wallet	Receive	Complete	0.53867834	0.2
9/5/2018 15:39 BTC Wallet	Receive	Complete	0.82821834	0.28954
9/7/2018 15:35 BTC Wallet	Receive	Complete	7.69056589	6.86234755
9/9/2018 8:51 BTC Wallet	Send	Complete	0.00984272	-7.68072317
9/9/2018 17:00 BTC Wallet	Receive	Complete	0.01000295	0.00016023
9/10/2018 11:33 BTC Wallet	Receive	Complete	0.16993643	0.15993348
9/10/2018 11:34 BTC Wallet	Receive	Complete	0.96960386	0.79966743
9/21/2018 14:18 BTC Wallet	Receive	Complete	2.35056086	1.380957
10/4/2018 23:40 BTC Wallet	Receive	Complete	3.8770477	1.52648684
10/16/2018 17:27 BTC Wallet	Receive	Complete	4.6464137	0.769366
10/16/2018 18:39 ZRX Wallet	Buy	Complete	100	100

11/9/2018 15:48 BTC Wallet	Receive	Complete	5.27745858	0.63104488
11/13/2018 10:11 BTC Wallet	Receive	Complete	5.8386949	0.56123632
11/15/2018 17:17 BTC Wallet	Receive	Complete	5.97781883	0.13912393
12/7/2018 16:52 BTC Wallet	Receive	Complete	6.84567704	0.86785821
1/10/2019 15:48 BTC Wallet	Receive	Complete	7.21054922	0.36487218
1/11/2019 16:37 BTC Wallet	Receive	Complete	7.43692036	0.22637114
2/4/2019 15:07 BTC Wallet	Receive	Complete	8.96317189	1.52625153
2/4/2019 15:18 BTC Wallet	Sell	Complete	7.46654432	-1.49662757
2/4/2019 15:18 Cash (USD)	Buy	Complete	5000	5000
2/4/2019 21:08 Cash (USD)	Withdrawal	Complete	0	-5000
2/15/2019 15:11 BTC Wallet	Receive	Complete	7.94706587	0.48052155
2/20/2019 9:20 LTC Wallet	Buy	Complete	9.6402941	9.6402941
2/27/2019 6:56 BTC Wallet	Receive	Complete	12.94706587	5
2/28/2019 19:22 BTC Wallet	Receive	Complete	13.04706587	0.1
3/8/2019 10:20 BTC Wallet	Receive	Complete	18.04706587	5

CURRENCY TO		NOTES
		Bought 0.69939686 BTC for \$5,000.00 USD.
		Paid for with Chase - TOTAL BUS CHK
BTC	59e146bfb8770300ca6a78f7	*****2652. Your digital currency will arrive by the end of day on Tuesday Apr 17, 2018.
		Bought 0.29907074 BTC for \$2,600.00 USD.
		Paid for with Chase - TOTAL BUS CHK
BTC	59e146bfb8770300ca6a78f7	*****2652. Your digital currency will arrive by the end of day on Friday Apr 27, 2018.
BTC		
BTC	3KxuriewrZsxC6n5mc9hvVq4F9absjX5N2	attorneys fees
BTC		
BTC		
BTC		
BTC	16yvX3ehQoPjvbAFB68trKYmswT5T1ppsD	
		Bought 0.11949554 BTC for \$1,000.00 USD.
		Paid for with Chase - TOTAL BUS CHK
BTC	59e146bfb8770300ca6a78f7	*****2652. Your digital currency will arrive by the end of day on Saturday May 26, 2018.
BTC	155K7KLQcWrsRCxNpDCnyvj28J1X5Nkr8S	test
BTC		
BTC	1LQdbLvXbiQVhqWzvzqwSH87krimFQEpJx	omicron
BTC	1KThhzmQWTnrc1mtFKD4P2pvrJ1h7z8ed	test
BTC		
BTC		
BTC	17VxPC9vmkiZw3qDSDQ65BjTNGScu2RHZp	
BTC	17VxPC9vmkiZw3qDSDQ65BjTNGScu2RHZp	
BTC		
BTC	1GH9XkUd5nYs9nEwqdgwpXUFBv96qnTkAn	Omicron

BTC	1DTwypGXanoM3oxZNPki7Hy4ZiaLnpSu7	bread Bought 1.54532645 BTC for \$10,000.00 USD.
		Paid for with Chase - TOTAL BUS CHK *****2652. Your digital currency will arrive by the end of day on Wednesday Jul 18, 2018.
BTC	59e146bfb8770300ca6a78f7	
USD		
BTC	1A8nH8kBVxCejyD1D4mjhen3M6mBf2DqJ	test
BTC	5083a5425b4a5b0200000001	5b6f3cbfa44b440a3bde439e
USD		
USD		
USD		
BTC		
BTC		
BTC		
		Bought 1.79501181 BTC for \$12,000.00 USD.
		Paid for with Cash (USD). Your digital currency will arrive by the end of day on Saturday Aug 18, 2018.
BTC	59e146bfb8770300ca6a78f7	
USD		
		Bought 6.24808279 ETH for \$2,000.00 USD.
		Paid for with Cash (USD). Your digital currency will arrive by the end of day on Saturday Aug 18, 2018.
ETH	59e146bfb8770300ca6a78fb	
USD		
BTC		
BTC		
BTC	1FxzjzDTf1sfNXbG6gnvz5K6RGzDe9Kcy8	
BTC		
BTC		
BTC		
BTC	1QJNpquXXA87krGY7MsSFUyS5QuujfGVgh	Bitex
BTC		
BTC		
BTC		
BTC		
BTC		
BTC		
ZRX	5bb792a06ac54c0cdfa43f	Bought 100.0000 ZRX for \$94.45 USD.

BTC
BTC
BTC
BTC
BTC
BTC
BTC
BTC
USD
USD
BTC
LTC
BTC
BTC
BTC

5083a5425b4a5b0200000001

5c58c7edd9cd760718c6f009

59e146bfb8770300ca6a78ff

Bought 9.6402941 LTC for \$500.00 USD.

EQUIV USD TRANSACTION HASH

4909.89

2547.43

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9798.34

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9000

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-10000

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11757.32

-12000

1960.89

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5010.82 d03365eb2641950464fc9756276d5933a75f18ad7a94535d752f3d9171387d29

9295.22 5184a4b3b0ef7c435809b0fe5b5192769d795ba8948ed83b319ed1a2e6d2ab13

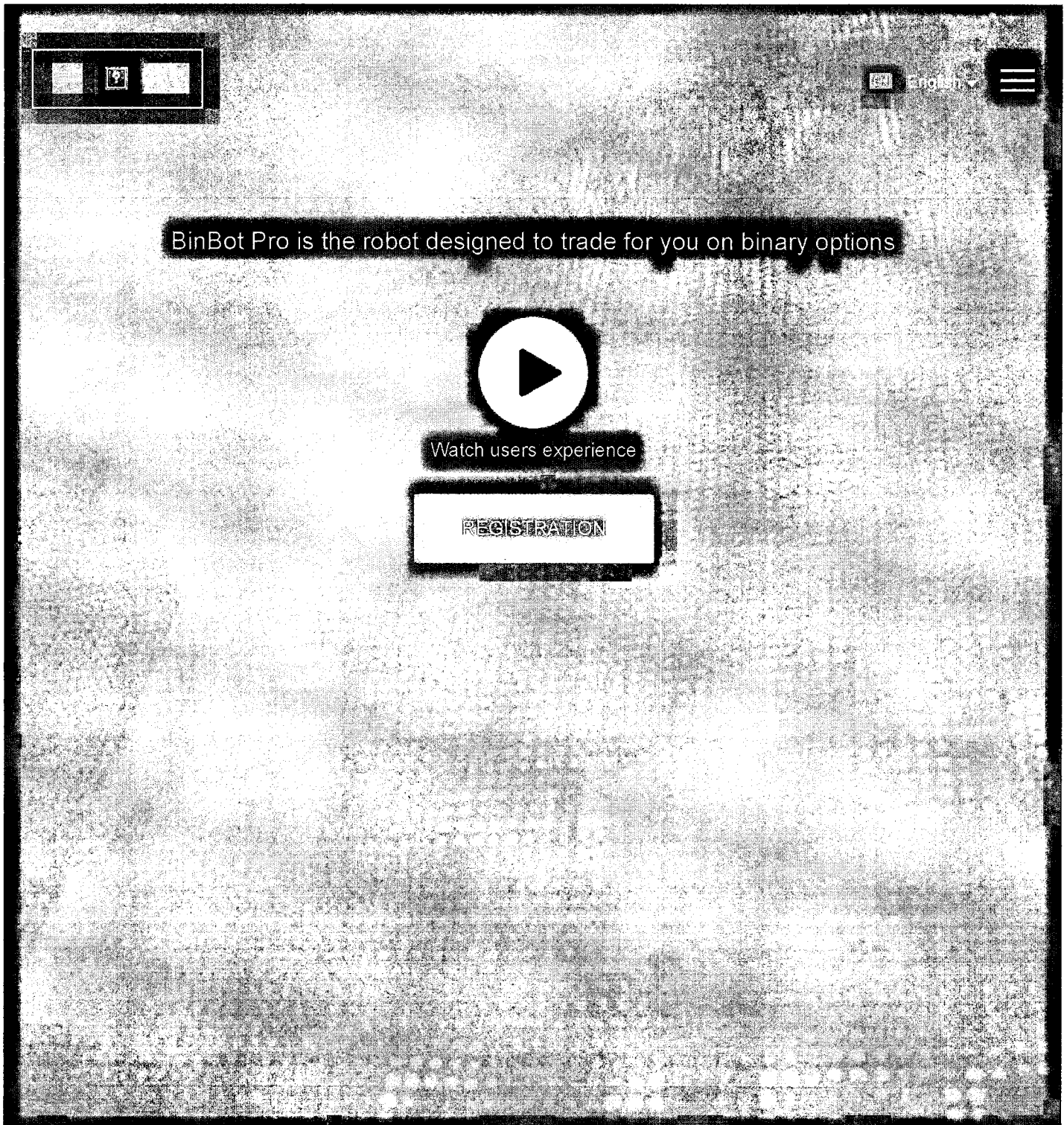
9994.55 9c5d43b50b16fc7db1ae05e48cbd5aad5bf7046ea2242d157bed52ee013e1968

4963.95 10a69ce8528fe73c3717d298bc96e55930be99459ca64e8955b2eacbd12e738c

92

3995.44 283433aba95c00ceac8b25ea83335cd4b0932716bf004eb0a3c76ce6eec2e7e3
3537.83 73762c6aa039c7d4b5e3b66fdec1ee25b216768572478f689f87a5d32e9d741f
771.72 021854ad681b3051ab491b205400bbea750ec83c417f81793698dffddfa3acf2
2965.47 e189ef074a62e89e0698fdd57a2430f0df2a8b486af4641aad79a415f608ac5
1324.48 54d4a16bdc88207a40c72e9b10fa2e5419813a993322c7bddba957e3ec468e11
824.8 b583d5224d484ce2158e124a7445c23070efc1af0672c5aba4fa3c4d8e7224c9
5202.41 e343661577fcb8993e97b287216dc46fb60fe657a761bda00e0d9bb9e08057dc
-5101.15
5000
-5000
1712.95 fcc018486ef57e3e4a54b6758db939b730b14f1d979e7d9189d64125cfddf3d5
490.54
19030.17 656ad5ec5765c5a86ba8eb1091a1af95c30112dfb2595671e2d7b7aea0051576
380.19 95a08c5314167db3eefca27916a412a4cf39496f28de34c18984a0e2b240b17d
19460.67 938ae47f33fa7e13da66c02daf5847e70d76681e66e18eb5e82586c4b1d19cfe

**Exhibit 12 - Omnicron, Circle Society, & BinBot Pro Website
Records**





English



Register

Choose your broker

**BINARYCENT**

\$500
Min. Deposit

\$0.1
Min. Invest

90%
Max. Returns



I'm not a robot



reCAPTCHA
[Privacy](#) - [Terms](#)

By selecting checkbox, I agree with the disclaimer below

Domain Profile

As of August 27, 2019

Ownership

Registered Owner	Privacy Protect, LLC (PrivacyProtect.org)
Owned Domains	About 1442915 other domains
Email Addresses	abuse@ilovewww.com contact@privacyprotect.org
Registrar	shinjiru technology sdn bhd

Registration

Created	May 15, 2018
Expires	May 15, 2020
Updated	Apr 16, 2019
Domain Status	No Website
Whois Server	whois.ilovewww.com
Name Servers	dynect.net

Website

Site Title	TheOmicronTrust
------------	-----------------

Current Whois Record

Reported on Aug 27, 2019

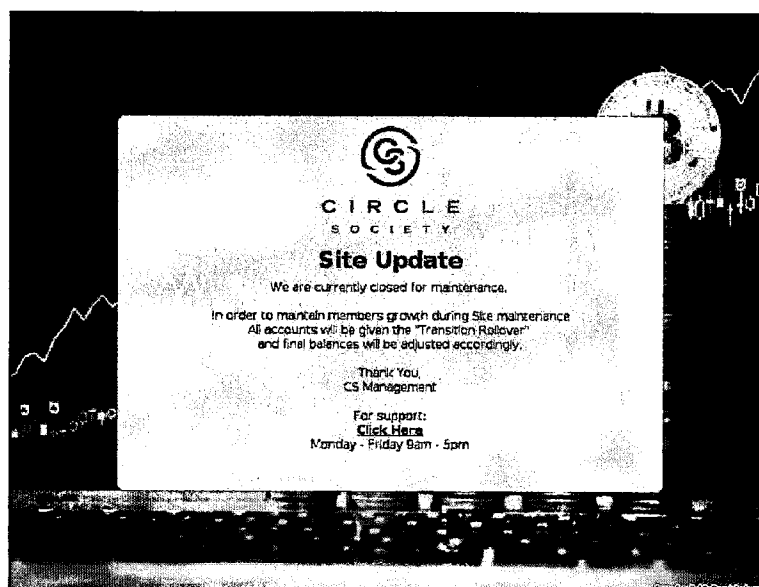
Domain Name: THEOMICRONTRUST.COM
Registry Domain ID: 2263532408_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.ilovevnu.com
Registrar URL: http://www.ilovevnu.com
Updated Date: 2019-04-16T06:23:23Z
Creation Date: 2018-05-15T03:33:41Z
Registrar Registration Expiration Date: 2020-05-15T03:33:41Z
Registrar: Shinjiru MSC Sdn Bhd
Registrar IANA ID: 1741
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registry Registrant ID: Not Available From Registry
Registrant Name: Domain Admin
Registrant Organization: Privacy Protect, LLC (PrivacyProtect.org)
Registrant Street: 10 Corporate Drive
Registrant City: Burlington
Registrant State/Province: MA
Registrant Postal Code: 01803
Registrant Country: US
Registrant Phone: +1.8022274003
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: contact@privacyprotect.org
Registry Admin ID: Not Available From Registry
Admin Name: Domain Admin
Admin Organization: Privacy Protect, LLC (PrivacyProtect.org)
Admin Street: 10 Corporate Drive
Admin City: Burlington
Admin State/Province: MA
Admin Postal Code: 01803
Admin Country: US
Admin Phone: +1.8022274003
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: contact@privacyprotect.org
Registry Tech ID: Not Available From Registry
Tech Name: Domain Admin
Tech Organization: Privacy Protect, LLC (PrivacyProtect.org)
Tech Street: 10 Corporate Drive
Tech City: Burlington
Tech State/Province: MA
Tech Postal Code: 01803
Tech Country: US
Tech Phone: +1.8022274003
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: contact@privacyprotect.org
Name Server: ns1.p27.dynect.net
Name Server: ns2.p27.dynect.net



Domain Report - CircleSociety.com

Domain Name **CircleSociety.com**

Prepared On **August 26, 2019**



Website Screenshot taken 08/14/2019

Domain Profile

As of August 26, 2019

Ownership

Registered Owner	Domains By Proxy, LLC
Owned Domains	About 17611895 other domains
Email Addresses	abuse@godaddy.com circlesociety.com@domainsbyproxy.com
Registrar	godaddy.com, llc

Registration

Created	May 9, 2011
Expires	May 9, 2020
Updated	Aug 15, 2018
Domain Status	Active
Whois Server	whois.godaddy.com
Name Servers	dynect.net

Network

Website IP Address	108.61.166.13
IP Location	Netherlands-Noord-Holland-Amsterdam Vultr Holdings Llc
IP ASN	AS20473

Current Whois Record

Reported on Aug 16, 2019

Domain Name: circlesociety.com
Registry Domain ID: 1655235131_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Updated Date: 2018-08-11T02:46:14Z
Creation Date: 2011-05-09T18:35:31Z
Registrar Registration Expiration Date: 2020-05-09T18:35:31Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 14455 N. Hayden Road
Registrant City: Scottsdale
Registrant State/Province: Arizona
Registrant Postal Code: 85260
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: circlesociety.com@domainsbyproxy.com
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 14455 N. Hayden Road
Admin City: Scottsdale
Admin State/Province: Arizona
Admin Postal Code: 85260
Admin Country: US
Admin Phone: +1.4806242599
Admin Phone Ext:
Admin Fax: +1.4806242598
Admin Fax Ext:
Admin Email: circlesociety.com@domainsbyproxy.com
Registry Tech ID: Not Available From Registry
Tech Name: Registration Private
Tech Organization: Domains By Proxy, LLC
Tech Street: DomainsByProxy.com
Tech Street: 14455 N. Hayden Road
Tech City: Scottsdale
Tech State/Province: Arizona
Tech Postal Code: 85260

Tech Country: US
Tech Phone: +1.4806242599
Tech Phone Ext:
Tech Fax: +1.4806242598
Tech Fax Ext:
Tech Email: circlesociety.com@domainsbyproxy.com
Name Server: NS1.P27.DYNECT.NET
Name Server: NS2.P27.DYNECT.NET
Name Server: NS3.P27.DYNECT.NET
Name Server: NS4.P27.DYNECT.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>



C I R C L E
S O C I E T Y

Site Update

Circle Society's site is currently in maintenance.

Please join the official telegram channel for updates:

<https://t.me/joinchat/AAAAAEklykTv0JtU00C7kg>

For those needing to complete forms please select the relevant link below:

- [Balloon Payment Form](#)
- [Individual KYC Form](#)
- [Corporate KYC Form](#)

Thank You,
CS Management

Exhibit 13 - Transcript of Participant 7 Testimony Under Oath

Saffron, David G; Kagel, David

Van Tuyl, Nathan 03/01/2019

3/1/2019

Condensed Transcript

Prepared by:

George Malas
CFTC

Monday, September 23, 2019

Page 1	Page 3
<p>1 UNITED STATES OF AMERICA</p> <p>2 Before the</p> <p>3 COMMODITY FUTURES TRADING COMMISSION</p> <p>4</p> <p>5</p> <p>6 _____*</p> <p>7 In the Matter of: *</p> <p>8 David G. Saffron and David L. Kagel *</p> <p>9 _____*</p> <p>10</p> <p>11</p> <p>12 INVESTIGATIVE TESTIMONY</p> <p>13 NATHAN VAN TUYL</p> <p>14 PAGES 1 - 173</p> <p>15</p> <p>16 Friday, March 1, 2019</p> <p>17 Los Angeles, California</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Reported by: Marty E. McArver, CA-CSR No. 2769</p> <p>24 NCRA Registered Diplomat Reporter</p> <p>25</p>	<p>1 APPEARANCES:</p> <p>2</p> <p>3 COUNSEL FOR COMMODITY FUTURES TRADING COMMISSION</p> <p>4 DIVISION OF ENFORCEMENT</p> <p>5 1155 21st Street, N.W.</p> <p>6 Washington, DC 20581</p> <p>7 BY: DANIELLE E. KARST, ESQ.</p> <p>8 Trial Attorney</p> <p>9 202.418.6158</p> <p>10 dkarst@cftc.gov</p> <p>11 -- and --</p> <p>12 GEORGE H. MALAS</p> <p>13 Futures Trading Investigator</p> <p>14 202.418.5249</p> <p>15 gmalas@cftc.gov</p> <p>16</p> <p>17</p> <p>18 COUNSEL FOR SECURITIES AND EXCHANGE COMMISSION</p> <p>19 DIVISION OF ENFORCEMENT</p> <p>20 444 South Flower Street</p> <p>21 Los Angeles, California 90071</p> <p>22 BY: MORGAN B. WARD DORAN, ESQ.</p> <p>23 Senior Special Counsel, Cyber Unit</p> <p>24 323.965.3230</p> <p>25 warddoranm@sec.gov</p>
Page 2	Page 4
<p>1 UNITED STATES OF AMERICA</p> <p>2 Before the</p> <p>3 COMMODITY FUTURES TRADING COMMISSION</p> <p>4</p> <p>5</p> <p>6 _____*</p> <p>7 In the Matter of: *</p> <p>8 David G. Saffron and David L. Kagel *</p> <p>9 _____*</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 INVESTIGATIVE TESTIMONY OF NATHAN VAN TUYL, taken</p> <p>17 by the Commodity Futures Trading Commission, pursuant to</p> <p>18 Subpoena Ad Testificandum, at Securities and Exchange</p> <p>19 Commission, 444 South Flower Street, Los Angeles,</p> <p>20 California, on Friday, March 1, 2019, from 10:35 a.m. to</p> <p>21 4:49 p.m., before Marty E. McArver, Certified Shorthand</p> <p>22 Reporter No. 2769 in and for the State of California,</p> <p>23 and Registered Diplomat Reporter.</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2</p> <p>3 WITNESS PAGE</p> <p>4 NATHAN VAN TUYL</p> <p>5</p> <p>6 Examination by Ms. Karst 10</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 DOCUMENTS/INFORMATION REQUESTED</p> <p>12 Pages 58, 64, 116</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Page 5

EXHIBITS

3 NATHAN VAN TUYL

4 (COMMISSION'S) DESCRIPTION MARKED

5 No. 1: Letter of January 30, 2019, 12
 6 to Nathan Van Tuyl from CFTC
 7 with Subpoena Ad Testificandum
 8 and Statement to Persons
 9 Providing Information about
 10 Themselves to the CFTC
 11 (15 pages)
 12 No. 2: Information from Hitesh Juneja 38
 13 entitled "Original Information
 14 shared with our attorney";
 15 SDKD-Hitesh-0000000003
 16 P.0001-03
 17 No. 3: Spreadsheet 39
 18 SDKD-Tuyl-0000000007 P.0001
 19 No. 4: Screenshots of text messages 80
 20 between Nathan Van Tuyl and
 21 David Saffron;
 22 SDKD-Murrin-0000000402 P.0001
 23 SDKD-Murrin-0000000406 P.0001
 24
 25

Page 6

EXHIBITS (continued)

3 NATHAN VAN TUYL

4 (COMMISSION'S) DESCRIPTION MARKED

5 No. 5: Letter of January 8, 2018, 80
 6 to Nathan Van-Tuyl from (104)
 7 David L. Kagel;
 8 SDKD-Tuyl-0000000006 P.0001
 9 No. 6: Screenshots from David 80
 10 Saffron's group Facebook (108)
 11 Pages;
 12 SDKD-Tuyl-0000000008 P.0001
 13 SDKD-Tuyl-0000000009 P.0001
 14 SDKD-Tuyl-0000000010 P.0001
 15 SDKD-Tuyl-0000000011 P.0001
 16 No. 7: Letter of February 5, 2018, 113
 17 to David L. Kagel, Ina Kagel, (114)
 18 and David Saffron from J. Owen
 19 Murrin; SDKD-Murrin-0000000011
 20 P.0001-03
 21 No. 8: Letter of February 12, 2018, 113
 22 to J. Owen Murrin from David (116)
 23 L. Kagel;
 24 SDKD-Murrin-0000000047 P.001
 25

Page 7

EXHIBITS (continued)

3 NATHAN VAN TUYL

4 (COMMISSION'S) DESCRIPTION MARKED

5 No. 9: Letter of February 15, 2018, 113
 6 to David L. Kagel, Ina Kagel, (119)
 7 and David Saffron from J. Owen
 8 Murrin; SDKD-Murrin-0000000051
 9 P.0001-04
 10 No. 10: E-mail from Devonna Murrin 113
 11 to Laura Malnar, February 17, (119)
 12 2018, with attached post by
 13 Alan Saffron to David Saffron's
 14 Facebook page;
 15 SDKD-Murrin-00000000381
 16 P.0001-03
 17 No. 11: Letter of March 2, 2018, to 122
 18 State Bar of California from
 19 J. Owen Murrin Re: David
 20 Kagel; SDKD-Murrin-0000000024
 21 P.0001-013
 22 No. 11-A: Color photocopy of color photo 121
 23 of David Saffron
 24
 25

Page 8

EXHIBITS (continued)

3 NATHAN VAN TUYL

4 (COMMISSION'S) DESCRIPTION MARKED

5 No. 12: Screenshots of David 124
 6 Saffron's text messages;
 7 SDKD-Tuyl-0000000012 P.0001
 8 SDKD-Tuyl-0000000016 P.0001
 9 No. 13: Saffron Video; 126
 10 SDKD-Tuyl-0000000001
 11 NOTE: Original DVD retained
 12 by CFTC; photocopy of label
 13 substituted
 14 No. 14: Screenshot from Exhibit 13 126
 15 taken at 4 minutes, 28 seconds (129)
 16 No. 15: Screenshot from Exhibit 13 126
 17 taken at 4 minutes, 31 seconds (131)
 18 No. 16: Screenshot from Exhibit 13 126
 19 taken at 8 minutes, 7 seconds (133)
 20 No. 17: Screenshot from Exhibit 13 126
 21 taken at 8 minutes, 16 seconds (133)
 22 No. 18: Screenshot from Exhibit 13 126
 23 taken at 9 minutes, 37 seconds (137)
 24 No. 19: Screenshot from Exhibit 13 126
 25 taken at 10 minutes, 15 seconds(138)

<p style="text-align: right;">Page 9</p> <p>1 EXHIBITS (continued)</p> <p>2 NATHAN VAN TUYL</p> <p>3 (COMMISSION'S) DESCRIPTION MARKED</p> <p>4 No. 20: Screenshot from Exhibit 13 126</p> <p>5 taken at 10 minutes, 17 seconds(138)</p> <p>6 No. 21: Saffron Audio; 139</p> <p>7 SDKD-Tuyl-0000000002</p> <p>8 NOTE: Original DVD retained</p> <p>9 by CFTC; photocopy of label</p> <p>10 substituted</p> <p>11 No. 22: Los Angeles Police Department, 153</p> <p>12 Data Sheet, Booking #5231959,</p> <p>13 with color photocopy of color</p> <p>14 photo of Faiq, Ahmed (Ali)</p> <p>15 No. 23: Screenshot of text messages 146</p> <p>16 and color photocopy of color</p> <p>17 photo of laptop, cell phone,</p> <p>18 and notebook with handwritten</p> <p>19 notes; SDKD-Murrin-0000000414</p> <p>20 No. 24: DVD played for witness 150</p> <p>21 NOTE: Original DVD retained</p> <p>22 by CFTC; photocopy of DVD</p> <p>23 substituted</p> <p>24 (Original Exhibits No 13, No 21, and No 24 were retained</p> <p>25 by counsel for Commodity Futures Trading Commission.)</p>	<p style="text-align: right;">Page 11</p> <p>1 under the laws and regulations that it administers.</p> <p>2 I will be the primary questioner today.</p> <p>3 Mr. Malas, my colleague, may also ask you questions.</p> <p>4 At this time I'll ask the others present on</p> <p>5 behalf of the CFTC and SEC to please identify themselves</p> <p>6 for the record.</p> <p>7 MR. MALAS: George Malas, investigator,</p> <p>8 Commodity Futures Trading Commission.</p> <p>9 MR. DORAN: Morgan Ward Doran, Senior Special</p> <p>10 Counsel, United States Securities and Exchange</p> <p>11 Commission.</p> <p>12 BY MS. KARST:</p> <p>13 Q Mr. Van Tuyl, this is an investigation by the</p> <p>14 CFTC to determine whether or not there have been or</p> <p>15 are violations of the Commodity Exchange Act or its</p> <p>16 regulations. The facts developed in this investigation</p> <p>17 might also constitute violations of other federal or</p> <p>18 state civil or criminal laws.</p> <p>19 Prior to opening the record, I showed you a copy</p> <p>20 of the formal order of investigation.</p> <p>21 Do you have any questions about it?</p> <p>22 A No.</p> <p>23 Q You have the right to be accompanied,</p> <p>24 represented, and advised by counsel. This means that</p> <p>25 you may have an attorney present and that your attorney</p>
<p style="text-align: right;">Page 10</p> <p>1 FRIDAY, MARCH 1, 2019, 10:35 A.M.</p> <p>2 LOS ANGELES, CALIFORNIA</p> <p>3</p> <p>4 MS. KARST: We are on the record at 10:35 a.m.</p> <p>5 on Friday, March 1, 2019, in connection with the CFTC's</p> <p>6 investigation in the matter of David Saffron and David</p> <p>7 Kagel.</p> <p>8</p> <p>9 Would you please swear in the witness.</p> <p>10 NATHAN VAN TUYL,</p> <p>11 having been first duly sworn, testifies as follows:</p> <p>12 THE WITNESS: Yes.</p> <p>13 EXAMINATION</p> <p>14 BY MS. KARST:</p> <p>15 Q Please state and spell your full name.</p> <p>16 A Nathan Van Tuyl. N-a-t-h-a-n V-a-n T-u-y-l.</p> <p>17 Q Are you represented by counsel?</p> <p>18 A No.</p> <p>19 Q I'm Danielle Karst. With me is my colleague,</p> <p>20 George Malas. We're officers of the Commodity Futures</p> <p>21 Trading Commission, or CFTC, for purposes of this</p> <p>22 proceeding.</p> <p>23 Also present today is Morgan Ward Doran, who</p> <p>24 is an SEC attorney. And he is here in connection with</p> <p>25 a separate investigation that the SEC is conducting</p>	<p style="text-align: right;">Page 12</p> <p>1 can advise you before, during, and after the examination</p> <p>2 here today.</p> <p>3 A Yes.</p> <p>4 Q Do you understand that there are criminal</p> <p>5 penalties for knowingly providing false testimony or</p> <p>6 knowingly using false documents in connection with this</p> <p>7 investigation?</p> <p>8 A Yes.</p> <p>9 (Exhibit No 1 marked for identification.)</p> <p>10 BY MS. KARST:</p> <p>11 Q I've already handed you what has been marked as</p> <p>12 Exhibit 1, which is the subpoena for your testimony here</p> <p>13 today.</p> <p>14 Exhibit 1 also contains an eight-page document</p> <p>15 entitled "Statement to Persons Directed to Provide</p> <p>16 Information Pursuant to a Commission Subpoena," which</p> <p>17 I will refer to as a privacy warning.</p> <p>18 Have you seen Exhibit 1?</p> <p>19 A If this is – Is this the same document I</p> <p>20 received via mail?</p> <p>21 Q Yes.</p> <p>22 A Yeah. I kind of skipped through it, but, yeah,</p> <p>23 looks like it.</p> <p>24 Q Are you appearing today in response to the</p> <p>25 subpoena?</p>

Page 25

1 is, it's like -- What I found out later was, this guy
 2 Trevor -- Yeah, just like I said, Trevor talked to Dion
 3 and said: Hey, like -- I don't know what he said --
 4 want to make some money, or whatever.
 5 And Dion meets with him.
 6 And he calls me and says, Hey, you should come
 7 look at this, because I don't know what's going on here.
 8 So that's how I met David Saffron.
 9 Q This was in Las Vegas on January 2, 2018?
 10 A Yes. That's the meeting I recorded.
 11 Q Was it a hotel in Las Vegas, or where was it?
 12 A I believe it was at the Cosmopolitan.
 13 Q And you said you recorded it?
 14 A Yes.
 15 Q Is it an audio or a video?
 16 A Audio.
 17 Q And you provided that to the CFTC?
 18 A Yes.
 19 Q We're going to play an audio later in the
 20 testimony today, and I'll confirm that that's the audio
 21 you're referring to.
 22 A Okay.
 23 MR. MALAS: Can I ask a follow-up question,
 24 Mr. Van Tuyl?
 25 BY MR. MALAS:

Page 26

1 Q So you mentioned Trevor, who introduced your
 2 friend Dion to Mr. Saffron. And then you mentioned a
 3 promoter of Mr. Saffron. Is the promoter Trevor?
 4 A Yes. Trevor is the only person that I know --
 5 Trevor talked to Dion, and that's my friend.
 6 And I was more knowledgeable, so he brought me to meet
 7 Saffron. Yes.
 8 Q So when you had previously testified that one
 9 of Mr. Saffron's promoters was paid to pull people --
 10 A Oh, I'm sorry. Yes, that was the Trevor I was
 11 referring to.
 12 MR. MALAS: Thank you.
 13 BY MS. KARST:
 14 Q Going back to the meeting in Las Vegas on
 15 January 2nd -- it's the meeting that you recorded --
 16 who was at that meeting?
 17 A There was David Saffron. There was Dion Jaffee.
 18 There was a guy named Devion.
 19 Q Can you spell that?
 20 A D-e-v-i-o-n.
 21 Q Do you know his last name?
 22 A I don't.
 23 Q Who is Devion?
 24 A He was just another friend who -- a friend of
 25 Dion.

Page 27

1 So I'll just give a little background so this
 2 makes more sense.
 3 So, I don't go to Las Vegas too much. Dion lives
 4 in Vegas and is there constantly.
 5 So I went out with him. And those -- all those
 6 people, every one I met in this, every name that's been
 7 brought up, I just met in Vegas. So Devion, Trevor,
 8 Saffron -- these are all people I had never seen in my
 9 life prior to this.
 10 Q Anyone else you remember?
 11 A It was just those four in that room.
 12 Q Saffron, Dion Jaffee, Devion --
 13 A And me.
 14 Q -- and you.
 15 Not Trevor?
 16 A Oh, I'm sorry. I'm sorry. No, Trevor was not
 17 there.
 18 Q What happened at the meeting?
 19 A Well, that was -- In the recording, it's Saffron
 20 explaining that he's a world-renowned bitcoin trader and
 21 has some crazy AI trading software and that -- He was
 22 just trying to convince us that --
 23 He was scamming us. That's what was happening.
 24 Q Did he show you a trading demo or pull up
 25 anything on the computer?

Page 28

1 A Unfortunately, I don't have video of it; but he
 2 showed a couple of things briefly, that I couldn't even
 3 tell you. But, I mean, I saw his computer. He did what
 4 he needed to do to fool us, so...
 5 Q What, if anything, did he explain about his
 6 background?
 7 I think you said he was a master trader.
 8 A Yeah. He said that he had clients like Mark
 9 Cuban. And he just started naming off big people that
 10 he works with, that he has their direct phone number.
 11 I think even at one point he even showed us --
 12 I can't say for certain, but he was showing us evidence
 13 of, like -- I can't think of the exact --
 14 I'm sorry. What was the question again?
 15 Q The question was: What did he explain about his
 16 background, which we've discussed --
 17 A Oh, that he has high-level clientele, that he's a
 18 world-renowned bitcoin trader.
 19 He described himself as being that, like, awkward
 20 guy who just needs cool friends to hang around, to show
 21 him the town and stuff like that, kind of just making
 22 us feel like he -- I don't know -- that he just doesn't
 23 have friends.
 24 Q Did he explain at that meeting what he was
 25 trading or doing?

Page 57

1 bitcoin that Rodney deposited on January 2, 2018?

2 A A few weeks after everything had happened, I

3 talked to Rodney. Everybody got on the phone call to

4 sort of piece stuff together. And we realized that

5 that's a possibility, that there wasn't a trading

6 software and that he had just been giving us -- that

7 he possibly gave us other people's money.

8 Q In January 2018 how did you think it was possible

9 to get a return of 30 bitcoin, 24 hours after you

10 provided it?

11 A How did I think it was possible?

12 Q Yes.

13 A David Saffron's very convincing. And he has a

14 British accent, which also kind of threw me off, and

15 everybody else. He sounds very intelligent -- He is

16 very intelligent and very manipulative.

17 And me being naive -- I mean, I've seen -- I've

18 seen big things happen like this. And I just thought --

19 I thought I was getting lucky.

20 Q From the list of investors on this chart, were

21 you the first one to receive a payout?

22 A Yes.

23 And that -- and I'll just state that that was a

24 collective payout. Only a few of those coins were mine.

25 I'd have to look to see the exact amount that I sent;

Page 58

1 but that 10 represents, I believe, four or five people.

2 Q What people? Who?

3 A They're actually -- I'll have to get those names.

4 I'll put that on the list, to get those names.

5 Q How much of the 10 bitcoin were your bitcoin?

6 A Between 2 to 4. I'd have to, like -- I wasn't --

7 The prices were fluctuating so fast that, like, it's

8 hard for me to remember. But I believe -- I'll just

9 say between 2 to 4. That's the best answer I can give.

10 Q And how did you obtain, then, the other bitcoin

11 to come up with the 10 total to give to Saffron?

12 A Everybody that --

13 Let's see. Who were the other people...

14 I'll just have to get those names.

15 Q Did you organize it? Did you ask the other

16 individuals for bitcoin?

17 A So because me and Dion met with Saffron, and once

18 we got back to our house, people started to call us,

19 like, about our meeting and everything. And a few other

20 people wanted to put a couple of bitcoin in to see if

21 it works. And so that 10 number represents a few

22 people, which I'll have to get.

23 Q The 10 bitcoin, is part of that from Dion?

24 A I can't -- I don't exactly remember who, but I

25 can -- That's something that I'll write down to figure

Page 59

1 out.

2 Q And then what did you do with the 30 bitcoin

3 return?

4 A Sent it right back to him.

5 Q You sent it right back to whom?

6 A David Saffron.

7 Q You sent it back to his address?

8 A Yes.

9 Q Through the same wallet?

10 A Through -- My wallet was the same, the Exodus

11 wallet. But not David's -- I noticed that every time

12 that we sent him, it was a different bitcoin wallet.

13 I don't even know if that matters. Sorry. I

14 just --

15 Q He provided you different bitcoin wallet

16 addresses --

17 A Yes. Yes.

18 Q -- each time you sent him money?

19 A Yes.

20 Q Do you know why?

21 A I think he would know (indicating Mr. Doran).

22 Just because -- I mean, because he's doing

23 dishonest stuff, dishonest activities.

24 Q By "he," you mean Saffron?

25 A Yeah, constantly needing to refresh your bitcoin

Page 60

1 wallet.

2 Q So when did you redeposit the 30 bitcoin return

3 with Saffron?

4 A I'm sorry. Can you say that one more time?

5 Q When did you provide the 30 bitcoin return back

6 to Saffron?

7 A On the 4th.

8 Q On the 4th how many bitcoin did you deposit with

9 Saffron? The chart states 16. Is that wrong?

10 A I believe this chart is incorrect.

11 Q So 16 is not the right number of bitcoin that you

12 provided on January 4, 2018?

13 A What would be a better -- It would be a better

14 fact -- It would be a better document to pull facts from

15 would be just the bitcoin wallet itself to confirm. But

16 I just know that I'm no accountant. And it's possible

17 that my numbers are flawed because of how I was trying

18 to simplify it, but...

19 Q So you provided Mr. Saffron with at least

20 16 bitcoin --

21 A Yes.

22 Q -- on January 4th?

23 A Yes.

24 Q And did you receive a return of 48 bitcoin on

25 January 7, 2018, as the chart reflects?

Page 77

1 Q Okay. And looking at the timeline, about halfway
2 down there's a time 3:25 to 4:00.
3 Do you see that?
4 A Uh-huh.
5 Q And then it says, "Event," "Explains our
6 compensation."
7 A Uh-huh.
8 Q What does that mean?
9 A Should we pull up the recording?
10 MS. KARST: I was planning to do that at the
11 end.
12 MR. MALAS: Yes, we don't need to do that
13 right now. We'll get to it.
14 THE WITNESS: Okay.
15 He explains that if we put in a bitcoin, we
16 get three back. And, yeah, that's...
17 BY MR. MALAS:
18 Q So it was explaining the returns or payout
19 scenarios?
20 A Yeah. How we can make money with him. Explains
21 our compensation.
22 BY MS. KARST:
23 Q Let's go back to the spreadsheet just once more,
24 Exhibit 3. If you look down at the Total column at the
25 bottom, let's start with BTC Lent, total 206.5. Is that

Page 78

1 an accurate number of the bitcoin deposited with
2 Mr. Saffron?
3 A If I had to guess, I would say not 100 percent
4 accurate, but --
5 Q Why not?
6 A Because I believe the third row on the 4th where
7 it says my name and 16, I believe that number is
8 incorrect. So that would make the entire math on that
9 column incorrect.
10 Q You think 16 is too high? too low?
11 A I thought it was -- I don't know.
12 Q Do you have records that would show what the
13 actual deposit was on January 4, 2018?
14 A Yeah. The bitcoin address that was originally
15 provided, that would reflect it. And I could probably
16 identify the transaction on the blockchain if it was
17 presented.
18 Q How about the Return column or estimated return
19 column, 509 bitcoin, is that accurate?
20 A That's an accurate number of all those Excel
21 cells added up.
22 Q Do you know how much, from these investors,
23 was actually returned besides the 30 bitcoin to you?
24 A Nothing.
25 MR. MALAS: One last question, sorry, and then

Page 79

1 we'll move on.
2 BY MR. MALAS:
3 Q Exhibit 2, the third page of Exhibit 2, which is
4 the timeline again.
5 A The third page, okay.
6 Q So in looking at -- There's two columns.
7 Starting with the first, 5:05 to 5:15, it states:
8 "Saffrons created Genesis Mining (USI Tech)."
9 And I believe earlier you testified that
10 Mr. Saffron indicated he had created the software for
11 USI Tech.
12 Was Mr. Saffron's statement that he created the
13 Genesis Mining or the software for USI Tech, important
14 in your decision to invest?
15 A Yes.
16 Q And next line down, 5:15 to 5:30 -- Strike that.
17 Second-to-last row, 7:00 to 7:10 states:
18 "Saffrons client list (Evan" -- E-v-a-n -- "Ahem" --
19 A-h-e-m -- "Mark Cuban, Maloof."
20 Was Mr. Saffron's statement that his client list
21 included Evan Ahem, Mark Cuban, and Maloof important in
22 your decision to invest?
23 A I will say it, for the record, everything that
24 he said equally contributed towards the decision. It
25 was just impressive fact after -- Well, not fact.

Page 80

1 Impressive statement after impressive statement
2 consecutively for eight minutes, so --
3 And, in fact, I just want to say that Evan Ahem
4 is spelled incorrectly. It's actually Evan Ahem. And
5 this is the individual that was supposedly a key person
6 in USI Tech. And Rodney Burton knew him or had met him
7 personally.
8 And because David Saffron brought his name up --
9 I'm just throwing that out there -- that's another
10 reason why we called Rodney, just to verify.
11 Q Sure.
12 And just to clarify and make sure I got your
13 answer right, so the statement Mr. Saffron made that his
14 client list included Evan Ahem, Mark Cuban, and Maloof,
15 was that an important factor in your decision to invest?
16 A Yes.
17 MS. KARST: I'm going to show you three
18 exhibits. I'll ask the court reporter to mark
19 Exhibits 4, 5, and 6.
20 (Exhibits No 4, No 5, and No 6
21 marked for identification.)
22 BY MS. KARST:
23 Q Handing you what's been marked as Exhibits 4, 5,
24 and 6, take a look -- Let's start with Exhibit 4. Take
25 a look and let me know when you've had time to review

Page 129

1 Q And who is performing the training demo on the
2 video?
3 A That is David Saffron.
4 Q Are there other people in the room?
5 A Yes.
6 Q Who are they?
7 A Vincent Ortega Jr. And there was a couple of
8 people that I couldn't identify -- that I didn't know
9 prior.
10 Q Who is Vincent Ortega Jr.?
11 A A friend of mine.
12 Q Did Mr. Ortega invest?
13 A He did.
14 Q Do you know how much?
15 A Not exactly. I'd have to confirm, just like
16 everyone else.
17 Q Could I direct you to Exhibits 14 and 15,
18 which are screenshots of the video you just watched.
19 Let's start with Exhibit 14, which is a
20 screenshot of the video at 4 minutes and 28 seconds.
21 A Okay.
22 Q In the top left of the screen do you see where
23 it says "BinBot PRO"?
24 A Yes.
25 Q Do you know what BinBot PRO is?

Page 130

1 A Yes.
2 Q What is it?
3 A It is a -- Well, this is a demo account for
4 an online crypto-trading software not made by David
5 Saffron.
6 Q Does Mr. Saffron use BinBot PRO?
7 A No. He was just having me record this.
8 And he wanted me to cut out the left panel that
9 says "BinBot PRO" so it looks like this is his software.
10 He was hoping that I would take out the left side of the
11 screen and that I would edit this video and send it out
12 to people to get more clients of his.
13 Q He asked you to edit the video, the part of the
14 computer screen that says "BinBot PRO"?
15 A Yes, the whole left panel on the screen in
16 Exhibit 14. He wanted me to take that out before
17 sending that to people.
18 Q When did he ask you to do that?
19 A Earlier in this video. He's not -- He's not
20 really -- You can hear what he's saying. "Just cut
21 this out," he's saying.
22 Prior to filming -- Prior to filming, and in
23 order to allow me to film him, I had to be careful with
24 my words.
25 I had to say, like, you know: If there's nothing

Page 131

1 that you don't want everything seen, just we'll take out
2 prior.
3 I gave him confidence that no one's going to
4 see this until he approves it.
5 Q Until Mr. Saffron approved it?
6 A Yes.
7 Q Did you know that BinBot PRO at that time was not
8 actually Mr. Saffron's when you recorded the video?
9 A No.
10 Q You did not know.
11 Let's look at Exhibit 15, which is a screenshot
12 of the video at 4 minutes and 31 seconds.
13 What is this showing here?
14 A Am I looking at the right thing?
15 Q Yes. Exhibit 15, do you see the columns, the
16 white part of the computer screen?
17 A Yes.
18 Q Do you know what that is?
19 A Well, those are --
20 Not really, but it's suggesting that these are
21 currency pairs and that he's trading -- that he's
22 trading currency pairs.
23 Q Is that what you understood at the time, that
24 Mr. Saffron was actually doing?
25 Did you think Mr. Saffron was trading currency

Page 132

1 pairs?
2 A Yes.
3 Q And did you think he was trading currency pairs
4 with deposits given to him by investors?
5 A Not necessarily. He said that this was a demo
6 account that only had \$1,000 in it, and that he was just
7 showing us an example of how this works, so not that
8 this was necessarily our money that he was trading, but
9 more so we were filming this video to show people.
10 MS. KARST: I will ask Mr. Doran to
11 fast-forward or play the video starting at 6 minutes
12 and 34 seconds, and stopping at 7 minutes.
13 (Exhibit No 13, DVD, plays.)
14 BY MS. KARST:
15 Q All right. Did you hear Mr. Saffron say in the
16 video that was just playing that he had 57 different
17 computers?
18 A Yes.
19 Q Is this something that you had heard before?
20 A He might have mentioned in one of our original
21 meetings that he had a bunch of servers set up
22 somewhere.
23 Q Do you know if he actually had 57 computers?
24 A I doubt it.
25 Q Did you think at the time you were filming, that

Original Information shared with our attorney:

Nathan will be providing you with complete timelines. I am including my experience here:

January 1st and 2nd I received calls from Nathan and Dion informing me that they were in Las Vegas meeting with David Saffron who had promised them 3 to 1 returns in as little as 3 days on Bitcoin investments. I was put on call with David who made the following claims:

- Mr. Saffron was trading and managing a portfolio of over 5000 bitcoin (roughly \$75million)
- He was using an automated robot/AI/trading software that was able to open and close positions automatically and net him a 5 to 8 times return on the trades.
- He required more funds to be able to scale up his trading.
- He had 1000 BTC (about \$15m) in a private escrow that David Kagel (his attorney) had access to. In case he was unable to provide the promised returns within the provided timeframe, Mr. Kagel would access the escrow to pay out to the investor. The letter shared with me for this purpose is here ->

<https://drive.google.com/open?id=0B73W4ajUYPF6MmxRTjk4dmZGYUo4NDZTcWFpSFJ1LXFUazVF>

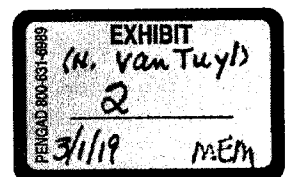
On January 3rd, I received text from Nathan confirming that he had done a 10btc investment (\$150,000) and received 30btc (\$450,000) payment in a 24 hour period. I was told the source of this increase was the cutting edge software trading that David Saffron was utilizing.

On January 4th I flew out to Vegas to meet David Saffron and his group. We had a preliminary meeting where he re-stated the points he made over the phone (noted above). At this point he invited us (Nathan, Dion, and I) to his room so he could share more evidence of returns.

He showed a few screenshots of returns to other clients. He said he had open positions available that would mature on Sunday and would provide a 3 to 1 return, failing which the escrow would cover this investment, and excused himself to attend some phone calls. Based on Nathans' experience and the information presented I personally had my business partner send in 20btc with the expectation of 60 BTC return on the following sunday, 3 days later.

On Sunday, David Saffron got on a phone call with me and suggested that I invest additional funds and that I should expect to receive 60btc in a few hours. He put me on call with David Kagel and had him confirm again that he indeed had an escrow and also sent me the attached letter. I promised further investment after the first return was done.

Over the course of the next 20 days David Saffron made tens of excuses including demonstrably false statements (such as claiming he sent the funds to Nathan, that it was stuck in the banking channels and so on). He further apologized for the delay and promised to increase the return to 65btc, then 70 btc, and eventually 130btc with the



promise to return the funds 21 days from initial investment (January 25-26). He claimed that his usual cycle was 21 days but in an effort to please Nathan he promised it in 3 days which he was unable to keep.

During this time he continued to push for more investments, which I continued to promise only on delivery of the initial deal.

On January 13th, I spoke with David Kagel and asked him to release the funds from the escrow. Mr. Kagel promised to do so. A few hours later, I asked again for a status update and he claimed to have released the funds to Mr. Saffron after stating he wasn't in town to do so, and then claiming he had "done what was needed and now David Saffron will handle things".

Mr. Saffron meanwhile claimed that Mr. Kagel didn't know how to work with Bitcoin properly and had misled me about releasing the bitcoin. Over the next few days the same excuses continued and Mr. Saffron stated he was closing additional clients and would use those funds to "leverage his positions" and would be able to pay me back. As of today, the same excuses continue. During this time I have been able to research further into Mr. Saffron and Mr. Kagel's backgrounds and discovered this is typical for them. I also spoke with other victims not related to Nathan's group who have been put through the same process and are currently trying to recover their funds.

Nathan will be able to furnish more complete timelines including his experience, audio and video recordings of David Saffron making such claims and trying to close clients.

Information from Nathan:

Here is an audio recording of the initial meeting I had with David Saffron at his hotel room at the Cosmopolitan hotel in Las Vegas on January 2nd at 3:04pm:

https://drive.google.com/open?id=1DnbwVgR9AofVcy3HUnRYC_f8sGAQ7ohO

This is a timeline of the audio recording

Timeline	Event
0:00 - 0:55	His Pitch
0:55 - 3:10	Sob Story (also part of pitch)
3:10 - 3:25	Explain why he needs us
3:25 - 4:00	Explains our compensation
4:00 - 4:50	Pitch
4:50 - 5:05	Testimonials

5:05 - 5:15	Saffrons created Genesis Mining (USI Tech)
5:15 - 5:30	Saffron created USI Tech's renewable energy technology
5:40 - 6:00	Saffrons an inventor
6:00 - 7:00	Saffron wants other to rise with him
7:00 - 7:10	Saffrons client list (Evan Ahern, Mark Cuban, Maloof
7:10 - 8:00	How to get started

Over the next 5 days, Bitcoin was given to David Saffron daily as shown in this spreadsheet:

<https://drive.google.com/open?id=1OqCiiPMvHh5-ooThuKIaatsSGdXFrP2>

On the 11th of January Saffron allowed me to record video of his "trading bot":

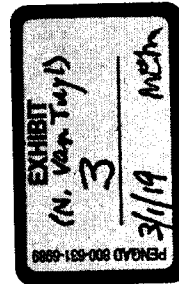
<https://drive.google.com/open?id=1meOLkCiW1YmFBZplyNiwR3a3A5kLyRJh>

Updates Since the above:

David created and launched bitm8.io, then theomicontrust.com, which was renamed to circlesociety.com over a course of 5 months. I kept in touch with him and continued to request that he pay out what is owed to us. At this point David stated that he would be able to pay us should I promise to get him more investment in his websites. He finally paid a portion of what he owed (100btc) to us with the condition that we reinvest a portion on his new site or get more investors.

Being unwilling to publicize or promote David at all, we simply reinvested a portion under various pseudonyms which is now stuck in his website pending release. From the conversations with other investors like Rodney Burton, they have still not been paid by David and various excuses have been implemented.

Lending Date	Name	BTC Lent	Return	Delay Bonus	Return	Referrer	Release Date
1/2/18	Rodney	25	75		3-1	Nathan	1/8/18
1/3/18	Nathan	10	30		3-1		1/5/18
1/4/18	Nathan	16	48		3-1		1/7/18
1/4/18	Hitesh	20	60	70	3-1	Nathan	1/7/18
1/4/18	Kam	2.5	5	2.5	2-1	Nathan	1/7/18
1/5/18	Rodney	27	79	25	3-1	Nathan	1/8/18
1/5/18	Jamison	50	100	50	2-1	Rodney	1/8/18
1/6/18	Dee W	5	10	5	2-1	Rodney	1/9/18
1/6/18	Tavon	1	2	1	2-1	Rodney	1/9/18
1/6/18	Frank	50	100	50	2-1	Rodney	1/9/18
	Total	206.5	509	203.5			



To: David Saffron.

Details

<https://zoom.us/j/2519973628>

1:30 now

1/3/18, 1:30 PM

Can you give me 10 more 1 BTC

Yep

All good

Send me your wallet address for return of 30BTC

Nathan Van Tuy
Bitcoin BTC address

37BT

Can you get a match for a missing note
only was asking about

Yes for what position?

1 BTC 10 BTC

10 BTC 10 BTC

1/3/18, 4:11 PM

These ten are from you and Vincent correct ??

Yes

Okie

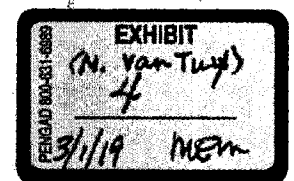
If you want to only deal with one name then
just my name is fine otherwise look at
vince and I as a partnership

Nate/Vince

Okie
I was just curious

Iv already made 49 coin on the 10 in 3 sessions

iMessage

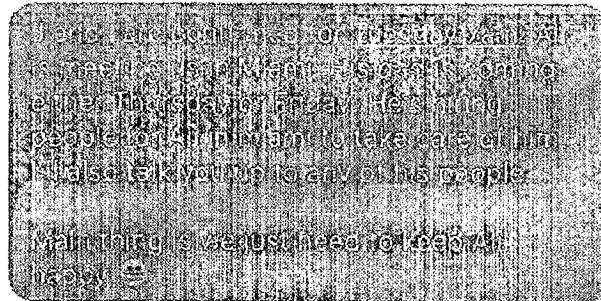


1/15/18, 2:37:32 PM

Details

Yes

Security has not vetted him yet

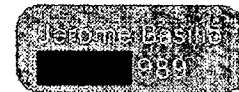
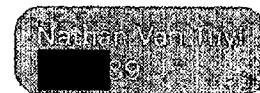


On my plane tomorrow

Need your

Dob

First last



Got both of you already

Gotta get Rodney 50

The min we send 50

He will re-pop with 500

If you can get Jerome in for 100

Fix Rodney and Hitesh that's all the

leverage needed

<https://www.1hotels.com/south-beach/search>

Book yourself a room here

For you and j

You arent booking me a room??

My client booked and paid for my room and security

iMessage



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A Professional Corporation
1801 Century Park East, Suite 1201
Los Angeles, CA 90067
TELEPHONE: (310) 860-9975
E-MAIL: dkagel@earthlink.net

January 8, 2018

Nathan Van-Tuyl
NVanthuyl@gmail.com

Dear Mr. Van-Tuyl;

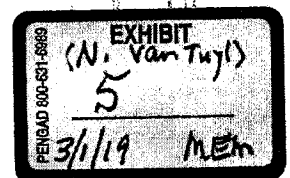
This firm acts as counsel to David Saffron. We understand that you will be depositing bitcoin and other forms of cryptocurrency with Mr. Saffron which he will be investing on your behalf. He has agreed to return your investment to you together with a profit. In order to assure that your deposit will be returned in the event that Mr. Saffron is unable or unwilling to do so he has deposited at least one thousand bitcoin in a wallet to which he has given us access. He has agreed to at all times maintain the deposit in the wallet and give this firm unrestricted access to it. If you have not received the return of your deposit from Mr. Saffron following ten business days' notice to him with a copy to us, upon five business days' notice to us we will return your deposit from the aforementioned wallet.

You agree to copy us on all written communication between you and Mr. Saffron and to advise us of the contents of all verbal communications between the two of you.

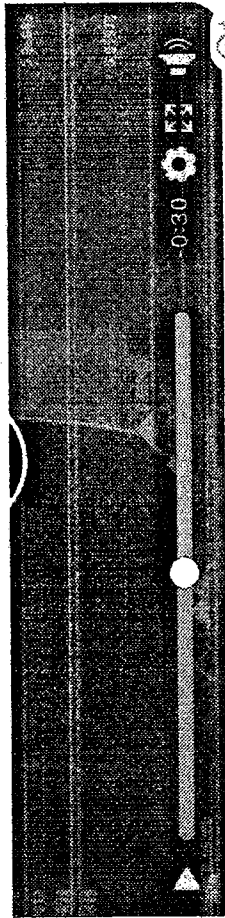
Very truly yours.

Kagel Law, a Professional Corporation

By 
David L. Kagel



David Saffron



new small file demos

JAN 19TH, 7:14PM

Nathan Van Tuyt • Bitcoin Multiplier

Hi everyone,

This is how this works:

You send me a minimum of 5 BTC and we'll double it and send it back in 14 days.

(100% after 7 days + 100% after 14 days = 200%)

If you would like to participate with less than 5 BTC, team up with others.

We only accept FULL Bitcoins (No fractions of a BTC)

Please confirm with me via text once you have sent BTC and I'll respond with your BTC release



Options

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Notif

Facebook

https://fac

Shared Ph



The above post was made by Nathan Van Tuyt. It is not a recommendation for you to send him any BTC and he is not responsible for any loss of BTC or other assets. Please do not send him any BTC and do not follow him on any social media. Thank you for your attention.



David Saffron



The day of your release, I'll ask for your BTC address to confirm it is correct.

Text me for my BTC address to get started.

Provide your name and how much BTC you want to send and I'll call you back as soon as possible.

714-415-8585

Remove this



Tue

JAN 19TH, 11:49PM

Sun

Sun

Sat

Sat

Fri

Fri

Will do, please send me the btc for Meridasep
im trying to help but people are getting impatient
Bitcoin

JAN 24TH, 12:28PM

JAN 24TH, 3:13PM

JAN 24TH, 11:59PM

Facebook F

https://face

Shared Phc

January 24th, 3:13

Hello??

Where are you?

David, please call me





EXHIBIT
(N. Van Duy)
11A
9/1/19 McArver